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PC1

Name: Patricia Adamo

Community of Residence: New York, NY

Comment:

Iconic wildlife viewing regions, such as Denali National Park and Lake Clark National Park, contain iconic species (bear, wolves, etc) that millions of Americans love and come to see yearly.

The implementation of measures to areal shoot the above species not only raises ethical questions but also lacks scientific evidence supporting their effectiveness in increasing prey populations for hunters.

Studies have shown that Alaska's predator control programs, aimed at boosting moose, caribou, and deer populations for hunters, do not effectively increase human moose harvests. Additionally, these programs would have serious and negative impacts on the Denali and Lake Clark ecosystems.

As wolves don't decimate wild inhumane populations and they don't pose threats to human safety, why does Alaska continue to get away with outdated and incorrect management policies?

I implore you to please stop this legislation from going through.

Sincerely

Patricia Adamo

PC2

Name: Paul Adams

Community of Residence: Barnstable Massachusetts

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Paul Adams

DATE: 12-27-2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

NAME. Paul Adams

ADDRESS. 800 Bearses Way. Unit 4NE. Hyannis, MA. 02601

Ahtna Intertribal Resource Commission

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Phone: (907) 822-4466 Fax: (907) 822-4406 connect@ahtnatribal.org

December 26, 2024

Alaska Board of Game

P.O. Box 115526

1255 W. 8th Street

Juneau, Alaska 99811-5526

Dear Alaska Board of Game Members:

On behalf of the Ahtna Intertribal Resource Commission (AITRC), thank you for the opportunity to submit comments for your consideration during this regulatory cycle. AITRC represents the eight federally recognized tribes in the Ahtna Region, working collaboratively to protect and enhance Ahtna people's customary and traditional uses of wildlife and other natural resources.

Our comments reflect the collective input of AITRC member tribes and experienced staff, guided by our Fish and Wildlife Committee who have a deep connection to the land and resources within the Ahtna Territory.

We trust these comments will assist the Board in making informed decisions that support sustainable wildlife management. Thank you for your dedication to this vital work and for considering the perspectives of AITRC and our member tribes.

Tsin'aen,

Nick Jackson

Chair Fish and Wildlife Committee AITRC

PROPOSAL 1

5 AAC 92.015. Brown bear tag fee exemption.

Reauthorize the brown bear tag fee exemptions for the Central and Southwest Region Units as follows:

AITRC supports Proposal 1

AITRC supports this proposal, as it would remove some of the barriers to participate in brown bear harvest. We are not aware of any conservation concerns that this proposal would negatively impact, as this proposal is renewed annually and has been in effect for the last few years.

****

PROPOSAL 2

5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. 5 AAC 95.052. Discretionary permit hunt conditions and procedures.

Open two bear baiting seasons in Units 9, 11, 13, 14B, 14C, 16, and 17 where bear baiting is legal as follows.

AITRC Opposes Proposal 2

The Ahtna Territory encompasses Units 11–13, with Unit 12 outside the scope of this regulatory cycle. As proposed, expanding the bear baiting seasons in Units 11 and 13 would create a season lasting from April 15 to October 15.

During the summer and fall seasons, these areas are heavily used by people who pick berries, gather edible plants, and hunt small and big games. Public safety concerns arise because bear baiting station locations are not widely disclosed, leaving the public unaware of areas they should avoid while in the woods.

Recent incidents reported by at least one AITRC board member highlight the significant safety risks of bear-baiting stations near public areas.

Additionally, we believe that proposals of this nature are better suited for submission by local fish and game advisory committees or residents of the affected areas. These groups possess the local and traditional knowledge necessary to assess the status of land use and animal populations within their jurisdiction, as outlined in 5 AAC 97.005.

Finally, there is concern regarding the potential for incidental harm, such as the orphaning of cubs. If a sow is taken prematurely, particularly in July, her cubs may not yet be independent, leading to unnecessary loss of wildlife.

For these reasons, AITRC strongly opposes Proposal 2.

****

PROPOSAL 3

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

Allow the use of cellular cameras for the taking black bear and brown bear over bait in Units 9, 11, 13, 14B, 16, and 17:

AITRC Opposes Proposal 3

AITRC opposes Proposal 3, which would permit cellular cameras at bear-baiting stations. These cameras would allow individuals to monitor game activity remotely, eliminating the need for physical presence at the baiting site. This "hunt from home" approach could enable individuals to set up additional bait stations and visit only when bears are active.

Under current regulations (5 AAC 92.044), a permitted bear baiting station operator is limited to two stations. However, guide outfitters in Units 11–13 are allowed to operate up to 10 bear-baiting stations simultaneously. Proposal 3 raises significant ethical and conservation concerns, particularly concerning the principle of fair chase.

The adoption of this proposal could:

- lead to excessive habituation of bears to human-provided food sources used as bait.
- Result in harvest rates exceeding historical levels due to the increased efficiency of remote monitoring.

Additionally, allowing cellular cameras for bear baiting would complicate enforcement of camera use for other species, making it more challenging to regulate hunting practices effectively.

For these reasons, AITRC strongly opposes Proposal 3.

****

PROPOSAL 4

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Establish general season, archery only sheep hunts in Units 9, 11, 13, 14A, and 14B:

AITRC Opposes Proposal 4

AITRC opposes Proposal 4 and all archery-only seasons, as bow hunters are not restricted from participating during the regular hunting season. This proposal would unfairly extend the Dall sheep hunting season to benefit a specific special interest group.

The majority of Dall sheep harvest occurs early in the season. Extending the hunting season could exacerbate conservation concerns by increasing harvest pressure on Dall sheep populations, which are already struggling across Alaska.

Furthermore, the proposed additional hunt from July 21–31 falls during one of the year's warmest months, significantly increasing the risk of meat spoilage and waste.

For these reasons, AITRC opposes Proposal 4.

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PROPOSAL 39

5 AAC 92.108. Identified big game prey populations and objectives.

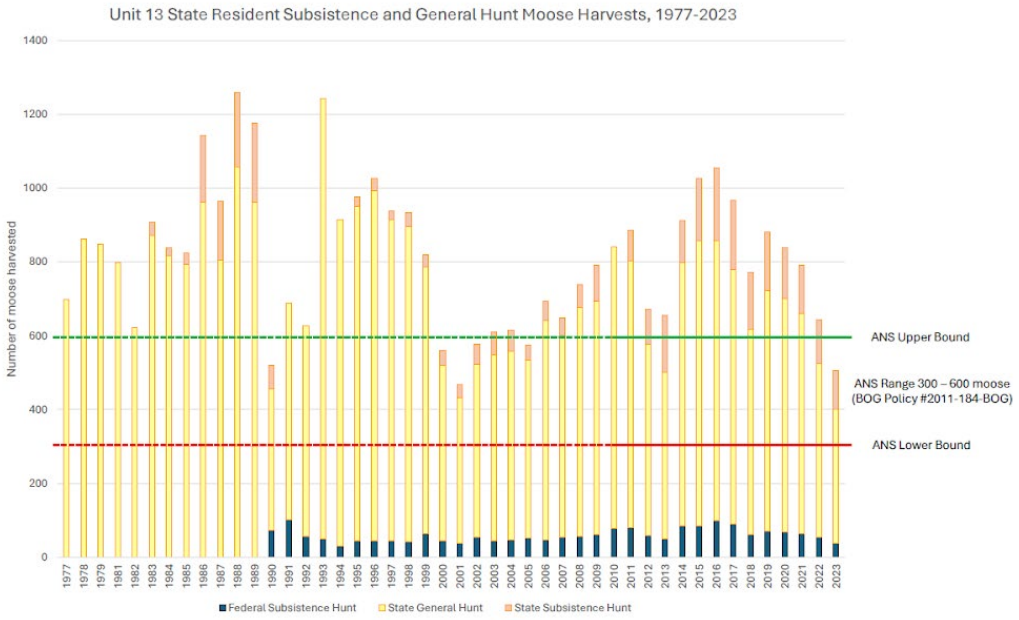
Reduce population and harvest objectives for moose in Unit 13B as follows:

Population	Finding	Population Objective	Harvest Objective
…			
Moose			
…			
GMU 13B	Positive	**4,500–5,500** [5,300–6,300]	**200–400** [310–620]
….			

AITRC's Opposes Proposal 39.

AITRC opposes this proposal due to insufficient data to make an informed assessment. The Board of Game (BOG) has established the Amount Necessary for Subsistence (ANS) for moose in Unit 13 at 300–600 moose, with no findings for individual subunits. Historical harvests, excluding drawing permit hunts and non-subsistence hunts, have often exceeded the upper ANS limit of 600 moose, except in specific years such as 1990, 2000–2002, 2005, and 2023. Revisions to Intensive Management (IM) objectives are unlikely to impact ANS findings, as IM objectives typically exceed ANS determinations. While the proposed changes to IM population and harvest objectives appear reasonable, they raise concerns about the accuracy of the current Unit 13B population index and the potential effects on predator control program authorizations. Historically, the Unit 13B moose population index would have been within IM objectives during periods such as 1982–1999 and 2007–2016, falling below only in 2000–2006 and 2017–2023. Similarly, harvests would have been within objectives in years like 1981–1989 and 2009–2018 but below objectives during 1978–1980, 2000–2008, and recent years like 2021–2023. Although the current predator reduction program is designed to address failures to meet IM objectives, adopting the proposed revisions would likely not result in the loss of this program, given that population and harvest indices have already been below proposed objectives in recent years. What else hasn't been considered is the harsher winters GMU 13 has been experiencing the last

few winters, survival rates, and Wildlife vehicle collisions.



****

PROPOSAL 40

5 AAC 92.108. Identified big game prey populations and objectives.

Change the population objective for moose in Unit 13C from 2,000 - 3,000 moose to 2,500 - 3,250 moose.

AITRC is neutral on Proposal 41.

One approach to increasing harvest is to adjust the hunting season. For example, last year's frost didn't occur until the very end of the hunting season, which impacted harvest opportunities. However, the accuracy of ADFG's reported numbers is questionable, as insufficient data has been presented. The numbers are adjusted to meet objectives rather than based on what the land can sustainably support.

The Board of Game (BOG) has established an Amount Necessary for Subsistence (ANS) for moose in Unit 13 at 300–600 moose, with no findings for individual subunits. Revisions to Intensive Management (IM) harvest objectives are unlikely to affect ANS findings, as IM objectives generally exceed ANS determinations significantly. When considering this proposal, it is essential to note its relation to Proposal 40, submitted by the Copper Basin Advisory Committee (AC) to increase the IM population objective for Unit 13C moose. According to the department, the current harvest objective reflects an unsustainable harvest rate based on the existing IM population objective. However, if Proposal 40 is adopted, increasing the population objective may make the current harvest objective achievable.

Ultimately, the key question is whether the land in Unit 13C can sustain a larger moose population. Copper Basin AC believes that it can, and this perspective should be considered alongside considerations of the potential impact on predator control programs.

****

PROPOSAL 42

5 AAC 92.108. Identified big game prey populations and objectives.

Reduce harvest objectives for moose in Unit 13E as follows:

Population	Finding	Population Objective	Harvest Objective
…			
Moose			
…			
GMU 13(E)	Positive	5,000–6,000	**150–300** [300–600]
….			

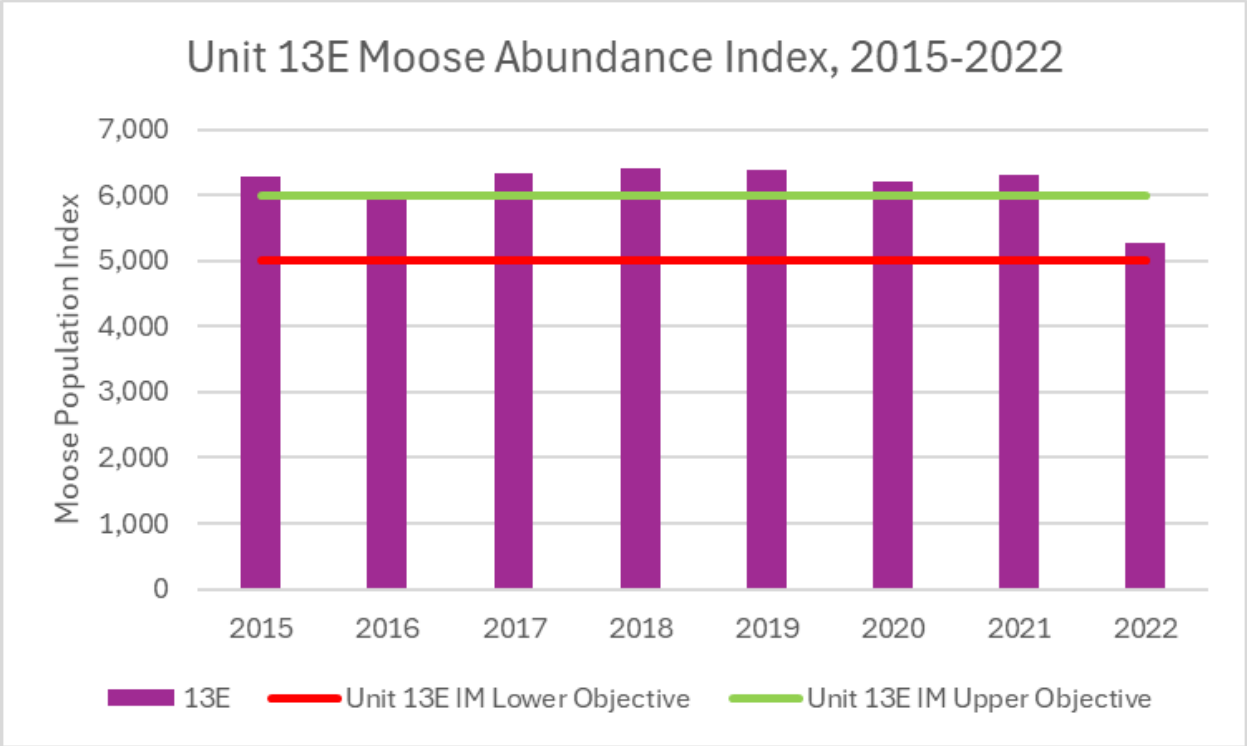
AITRC is neutral Proposal 42.

The Board of Game (BOG) has established an Amount Necessary for Subsistence (ANS) for moose in Unit 13 at 300–600 moose, with no ANS findings for individual subunits. Revisions to Intensive Management (IM) harvest objectives are unlikely to impact ANS findings significantly, as IM objectives generally exceed ANS determinations (refer to Notes and ANS chart for F&W Committee considerations under Proposal 39). The proposed changes to the IM harvest objective seem reasonable to AITRC's staff and Fish and Wildlife Committee, based on the data provided. Lowering the Unit 13E IM harvest objective to 150–300 moose would mean that harvests were below the proposed objective in select years—1990, 2000–2005, 2007, 2012–2013, and 2022–2023. Notably, Unit 13E moose harvest exceeded the proposed range only once, in 1988, when 303 moose were harvested. Given that harvests in the past two years have been below the proposed lower end of the objective, adoption of this proposal may not jeopardize the current predator control program.

Unlike Proposal 41, which included department data on the moose population index to justify lowering the IM harvest objective, Proposal 42 does not provide data on the status of the Unit 13E moose population index. This omission makes it challenging to evaluate whether the current population objective is appropriate or whether increasing the moose population might result in harvests aligning with the current IM harvest objective of 300–600 moose. However, on September 23, 2024, Ahtna, Inc.'s Edward Greybear shared department data with AITRC staff regarding Unit 13 moose abundance indices by subunit. This data suggests that from 2015–2022, the Unit 13E moose abundance index consistently fell within the IM population objective range

of 5,000–6,000 moose. This indicates that increasing harvest levels would require expanding the moose population, but doing so could risk habitat degradation and lead to a dramatic population decline.

The department's history of offering antlerless moose hunts in Unit 13E appears to align with these considerations, although no proposal to reestablish a cow hunt was submitted this cycle. This may be due to the 2023 population index showing further decline. However, as of November 21, 2024, Heidi Hatcher indicated in personal communication with Simon that the 2024 population index appears to have recovered to near the lower end of the IM objective range.



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PROPOSAL 43

5 AAC 85.045. Hunting seasons and bag limits for moose.

Establish an antlerless moose season in Unit 13A

AITRC opposes Proposal 43.

Proposal 43 seeks to reauthorize the antlerless moose hunt in Unit 13A. While the bull-to-cow ratio is currently at the management objective, the harvest objective remains below the management goal. However, we do not support using cow hunts to meet Intensive Management

(IM) harvest objectives. Although subsistence should receive priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

The moose population is estimated to be near the midpoint of the management objective. Still, without knowing the standard error for this estimate, it is unclear whether the population is significantly above this midpoint as directed by the Board of Game. Furthermore, there is no reported data on twinning rates to suggest that the habitat cannot sustain the current population. Environmental factors, such as heavy snowfall, could quickly reduce the population to levels within or below management objectives in a year.

AITRC understands that cow hunts are currently being used to manage bull-to-cow ratios and maintain current levels of bull harvest. However, without data on low twinning rates, an indicator of nutritional stress and overpopulation—there is insufficient evidence to justify reestablishing antlerless hunts in Unit 13A.

Lastly, we are concerned that reauthorizing cow hunts could pose a conservation risk, potentially restricting ceremonial moose harvests in the future. For these reasons, AITRC opposes Proposal 43.

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PROPOSAL 44

5 AAC 85.045. Hunting seasons and bag limits for moose.

Establish an antlerless moose season in Unit 13C as follows:

AITRC opposes Proposal 44.

Proposal 44 would establish an antlerless moose hunt in Unit 13C. Although the moose population in Unit 13C is currently within Intensive Management (IM) population objectives and the bull-to-cow ratio is near the objective of 25 bulls per 100 cows, the calf-to-cow ratio is dramatically low, with only 12 calves per 100 cows compared to the management objective of 30 calves per 100 cows.

In 2023, the moose population was estimated to be slightly above the midpoint of the IM population management objective range of 2,000–3,000 moose. However, without knowing the standard error for this estimate, it is unclear whether the population is significantly above the midpoint to justify an antlerless hunt, as directed by the Board of Game in 2015. Furthermore, no data on the twinning rates of cow moose in Unit 13C has been provided to evaluate whether the population is experiencing nutritional stress or whether the habitat cannot sustain the current population. Environmental factors like heavy snow could quickly reduce the population to levels within or below management objectives in a single year. This likely contributes, along with increased predation, to the extremely low calf-to-cow ratio observed in Unit 13C.

AITRC questions how harvesting cow moose would increase calf-to-cow ratios or meet management objectives. It appears that this proposal would use cow hunts to attain the bull-to-

cow ratio objective while maintaining current levels of bull harvest. Without evidence of low twinning rates that suggest density-dependent effects and habitat decline, Proposal 44 should not be adopted. This is especially true considering the local fish and game advisory committee's Proposal 40 to increase the IM population objective based on local observations and knowledge of Unit 13C.

Rather than implementing a new antlerless hunt in Unit 13C, the Board should consider increasing the "any-bull" allocation for the Community Subsistence Hunt. This approach would help ensure that subsistence needs are met while addressing any concerns the Alaska Department of Fish and Game (ADF&G) may have about moose populations exceeding management objectives.

Finally, there are no subsistence hunts for antlerless moose in Unit 13, even though subsistence is supposed to have priority allocation. Without data indicating habitat limitations or nutritional stress, antlerless hunts should not be used to meet harvest objectives.

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PROPOSAL 45

5 AAC 85.045. Hunting seasons and bag limits for moose.

Add a five-day archery only season for hunting moose in Unit 13:

AITRC opposes Proposal 45.

AITRC opposes proposal 45 and all archery-only seasons, as nothing prevents bow hunters from participating during the regular hunting season. This proposal seeks to extend the moose and Dall sheep hunting seasons exclusively for a specific special interest group. Such an extension could increase competition between sport bow hunters and rural subsistence hunters who rely on federal subsistence regulations, making it more challenging to maintain Unit 13 moose management population objectives and sustain populations at target levels.

This proposal raises additional conservation concerns for Dall sheep. Given that most harvests occur early in the season, extending the season could increase harvest pressure on already struggling populations throughout Alaska.

AITRC opposes this proposal, emphasizing that it contradicts the principles established by the Alaska Supreme Court in *McDowell v. State, 785 P.2d 6 (Alaska 1989)*, which states that "exclusive or special privileges to take fish and wildlife are prohibited." By requesting additional days exclusively for bow hunters, this proposal seeks a special privilege not afforded to other Alaska hunters. There are already ample opportunities for bow hunting during the regular season, as bow hunters can participate during the existing rifle season.

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PROPOSAL 46

5 AAC 85.045. Hunting seasons and bag limits for moose.

Change the Unit 13 community subsistence moose hunt to a registration hunt with additional conditions and restrictions:

AITRC opposes Proposal 46.

Proposal 46 would eliminate the state community hunt for moose in the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah community harvest areas outlined in 5 AAC 92.074(d). Adopting this proposal would effectively remove state regulations providing reasonable opportunities for community patterns of moose use, as recognized by Alaska Board of Game policies #2006-170-BOG, #2011-184-BOG, and #2017-220-BOG. It would also eliminate the process outlined in board policy #2017-220-BOG for determining community use of "any bulls" through the Tier II scoring criteria described in 5 AAC 92.070. This scoring system ensures that only the most dependent participants in the state community hunt receive any-bull permits, thus maintaining a balanced and fair allocation system.

Proposal 46 also seeks to reduce the moose hunting season for subsistence hunters participating in the state community hunt from the current 32 days (August 20 to September 20) to a mere 13 days (August 15 to August 27). Furthermore, it proposes a prohibition on motorized access outside portions of Unit 13 along major highways without a clear explanation, leaving the intent of this restriction ambiguous. The proposal would also eliminate the long-standing customary and traditional salvage, sharing, and reporting requirements of the state community hunt, which were carefully developed over many years by the board and AITRC constituents.

The current state community hunt (CM300), particularly the “any bull” portion, is both well-restricted and effectively managed. Harvest data from 2009-2023 demonstrate that CM300 has not led to excessive harvests, as shown in AITRC Figure 46-1. Notably, no community hunt occurred in 2010 due to litigation. Moreover, the Board of Game-established ANS for moose in

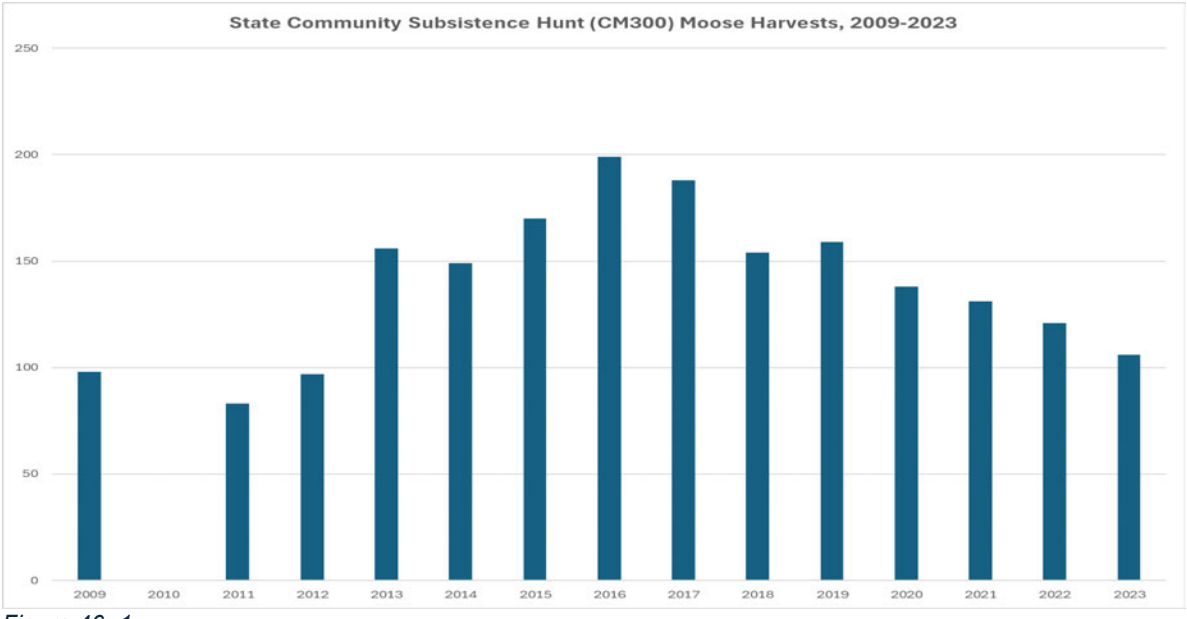


Figure 46- 1

Unit 13 is 300-600 moose, and harvests under state and federal subsistence hunts and state general hunts have consistently exceeded the lower bound of the ANS findings. State general hunts are also considered to provide subsistence opportunities, though additional legal clarification regarding their relevance to ANS assessments may be beneficial.

In conclusion, Proposal 46 undermines a system that balances subsistence needs, traditional practices, and sustainable management. The state community hunt's existing structure, including its allocation, access, and reporting requirements, should remain intact to preserve these critical hunting opportunities for AITRC communities.

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PROPOSAL 47

5 AAC 85.045. Hunting seasons and bag limits for moose.

Open a late season archery only drawing permit hunt for any bull moose in Units 13E and 13B, along the Denali Highway:

AITRC opposes Proposal 47.

AITRC opposes proposal 47 and all archery-only seasons, as nothing prevents bow hunters from participating during the regular hunting season. This proposal would extend the moose hunting season solely for a specific special interest group, undermining equitable access. Additionally, the Board of Game clarified in policy 2017-220-BOG that access to any bull permits must be limited to prevent overharvesting certain age classes of bulls. To address this concern, the board established in its 2017 policy that "any bull permits should be distributed to CHS moose hunt participants using the existing scoring criteria described in 5 AAC 92.070." This system ensures that any-bull permits are awarded to those most customarily and traditionally dependent on moose within the community harvest area identified in 5 AAC 92.074(d).

All any-bull permits are fully allocated to the state community moose hunt (CM300). Adopting Proposal 47 would negatively impact reasonable opportunities for subsistence hunting, which supports the community pattern of use recognized by the board in both regulations and board policies.

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PROPOSAL 48

5 AAC 92.121. Intensive Management Plan V.

Modify the intensive management plan for Unit 13 to include Nelchina caribou:

AITRC supports Proposal 48.

AITRC supports proposal 48 and all efforts to rebuild the Nelchina caribou population so that priority subsistence hunting may resume when the herd reaches the midpoint of the Intensive Management population objective of 37,500 caribou.

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PROPOSAL 49

5 AAC 85.025. Hunting seasons and bag limits for caribou.

Eliminate the harvest of Nelchina caribou as follows:

Close caribou hunting for six years or until the herd reaches the midpoint of the management objective of 37,500. This includes caribou hunting closures in Units 11, 12, 13, 14B, and 20E when Nelchina caribou are present.

AITRC has submitted and supports Proposal 49.

AITRC has submitted and supports Proposal 49, which aims to streamline the conservation process for the Nelchina Caribou Herd in light of its recent population decline. The proposal advocates incorporating the closure into regulation rather than relying on emergency orders (EOs). At the board's 2023 meeting in Soldotna, AITRC and its members called for a hunting moratorium on Nelchina Caribou, given the population range of 17,000 to 21,000 animals, to facilitate a swift recovery to Intensive Management (IM) objectives. The department indicated it would wait for summer season data regarding the herd's status before deciding if a harvestable surplus could justify keeping the hunt open despite the herd being around half the lower limit for the IM management objective.

Using EOs to close a hunt to protect the herd might create false hopes among potential hunters for returning to hunting each season during recovery. Yet, effective management calls for halting any harvest until at least the next regulatory cycle, ensuring that all state-priority subsistence uses have reasonable opportunities to continue, as endorsed by the board in other regions like Unit 18. Delaying harvests until the midpoint of the population goal is reached will provide the Nelchina Caribou with the best chance for recovery. By ceasing harvesting and allowing the caribou to thrive, we follow the adage: "We take care of them, they will take care of us." Keeping mature bulls within the population is crucial during this recovery phase as they help defend against predation, which could hinder the herd's recovery if it falls into a predator-pit scenario. Suppose the midpoint of the population objective is achieved before the following regulatory Region IV cycle. In that case, ADF&G should present an Agenda Change Request to the board to discuss reopening the hunt at that time.

This ties into the "experiment of Nelchina Herd Management" and considers the 2019 harvest "superabundance." Instead of submitting an emergency action request each year due to the Nelchina Caribou Herd's steep decline, this proposal establishes provisions to reopen harvesting if the population reaches a sustainable level. The proposal advocates for closure until the next cycle when the herd's numbers can be re-evaluated.

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PROPOSAL 50

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Change the sheep draw hunt DS165 in Unit 13D to a general season hunt:

AITRC opposes Proposal 50.

Given the observed declines in Dall sheep populations across Alaska, it is not advisable to liberalize sheep hunting currently. If this proposal is implemented, restrictions on hunting in other areas may lead to an influx of hunters in Unit 13D. Drawing permits effectively controls hunting pressure, ensuring that excessive hunter numbers and effort do not further jeopardize the already struggling Dall sheep populations.

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PROPOSAL 51

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep

Open a resident only sheep hunt in the Chitina River drainage in Unit 11:

AITRC supports Proposal 51 with modification.

Sheep populations are a concern throughout the state and due to this AITRC believes the proposal should be modified to a draw-only permit restricted to residents only. Dall sheep hunting is currently allowed throughout Unit 11 for full-curl rams through a harvest ticket, with the season running from August 10 to September 20. Rather than proposing a new resident-only hunt, Proposal 51 seeks to eliminate the non-resident Dall sheep hunting in part of Unit 11.

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PROPOSAL 52

5 AAC 92.530. Management areas.

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Create a new management area around MacColl Ridge in Unit 11, open to resident sheep hunting by registration permit only:

AITRC supports Proposal 52 with modification.

Currently, Dall sheep hunting in Unit 11 allows both residents and non-residents to hunt for a ram with a full-curl using a harvest ticket during the season from August 10 to September 20. Instead of introducing a new hunt exclusively for residents as suggested, Proposal 52 aims to eliminate nonresident hunting for Dall sheep in part of Unit 11 and create a new management area limiting Dall sheep hunting to Alaska residents through a registration permit.

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PROPOSAL 53

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Establish a resident, archery only sheep drawing hunt in Unit 13D:

AITRC opposes Proposal 53.

AITRC opposes proposal 53 and all archery-specific seasons, as no restrictions prevent bow hunters from participating in the regular season. This proposal aims to extend the Dall sheep hunting season, catering solely to a particular interest group. Since most Dall sheep are harvested early in the season, this proposal could raise further conservation issues due to increased harvest rates impacting the already vulnerable Dall sheep populations across Alaska.

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PROPOSAL 56

5 AAC 85.040. Hunting seasons and bag limits for goat.

Establish an archery only registration goat hunt in Units 13D and 11:

AITRC opposes Proposal 56.

AITRC opposes proposal 56 and all archery-exclusive seasons, as bow hunters are free to hunt during the regular season. This proposal aims to lengthen the mountain goat hunting season by 16 days ahead of the general hunting season, targeting a specific special interest group.

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PROPOSAL 57

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

Increase the bag limit for brown bear in Unit 13:

AITRC opposes Proposal 57.

Although AITRC and its members generally back liberal brown bear hunting seasons, Proposal 57 risks commercializing this practice and may lead to unsustainable harvest levels. Furthermore, 5AAC 91.031(g) states, "A person may sell, advertise, or otherwise offer for sale a skull or hide with claws attached of a brown bear harvested in an area where the bag limit is two brown bears per regulatory year…" This regulation could result in unforeseen negative impacts and significantly boost the harvest in areas that are easily accessible by the highway system.

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PROPOSAL 58

5 AAC 92.121. Intensive Management Plan V.

Reduce the minimum wolf population in the Unit 13 Intensive Management Plan for wolves:

AITRC is Neutral on Proposal 58.

AITRC acknowledges the challenges posed by the current population levels of the Nelchina Caribou Herd and the importance of addressing these concerns for the long term viability of herd and the people that rely on these resources. While AITRC staying neutral on this proposal, we encourage the Alaska Board of Game to weigh the potential impacts thoroughly and ensure that management actions align with long-term goals for wildlife and ecosystem health.
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PROPOSAL 59

5 AAC 84.270. Furbearer trapping

Lengthen the wolf trapping season in Unit 11:

AITRC opposes Proposal 59.

While AITRC generally supports liberal trapping seasons to accommodate customary and traditional uses, we oppose this proposal due to ongoing wolf research in Unit 11. AITRC, in partnership with WRST NPS, is conducting a study to estimate the number of individual wolves within Unit 11 using genetic analysis. Extending the season by 57 days could significantly impact the study by increasing harvest rates and the likelihood of collared wolves being harvested. Such outcomes would jeopardize our study's objectives of understanding seasonal range use and dietary variations.

AITRC respectfully requests that this proposal be tabled until the completion of ongoing research. Additionally, the proposed extended trapping season would result in the harvest of sub-optimal pelts during early fall and late spring seasons. It may lead to incidental harvests of non-target species during these periods, further complicating conservation and research efforts.

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PROPOSAL 60

5 AAC 84.270. Furbearer trapping.

Lengthen the coyote trapping season in Unit 11:

AITRC opposes Proposal 60.

AITRC opposes proposal 60 for reasons outlined in Proposal 59. While we generally support liberal trapping seasons to accommodate customary and traditional uses, we oppose this proposal due to ongoing wolf research in Unit 11. Extending the coyote trapping season by 57 days would

increase the likelihood of incidentally harvesting collared wolves, negatively affecting the ongoing wolf research program in Unit 11.

AITRC respectfully requests that this proposal be tabled until the completion of the ongoing study. Additionally, the proposed extended season would result in the harvest of sub-optimal pelts during early fall and late spring. It may lead to incidental harvests of non-target species during these periods, further complicating conservation and research efforts.

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PROPOSAL 61

5 AAC 85.065 Hunting seasons and bag limits for small game.

Change the start date for the ptarmigan hunting season in Unit 13B:

AITRC opposes Proposal 61.

AITRC opposes proposal 61, which seeks to reduce the Unit 13B ptarmigan hunting season start date by 10 days to account for seasonal differences in ptarmigan phenology in this highly accessible and popular hunting area. This proposal would delay the hunt opening from August 10 to August 20, ensuring young birds have more time to mature before the hunting season begins.

We believe ptarmigan regulations should remain consistent across units to avoid confusion and align with the Department's recommendations for Unit 13E. Uniform regulations help maintain clarity for hunters while supporting sustainable management practices.

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PROPOSAL 62

5 AAC 85.065. Hunting seasons and bag limits for small game.

Extend the spring hunting season for ptarmigan in Units 13A, 13C, and 13D:

AITRC opposes Proposal 62.

The department has indicated limited knowledge about ptarmigan population status and has requested hunters voluntarily collect and provide samples to understand population dynamics better and assess whether existing populations can support additional harvest pressure. However, AITRC understands that insufficient hunter participation in this effort has prevented the department from evaluating population status or potential impacts of increased hunting pressure.

Currently, Unit 13 ptarmigan hunting seasons vary between subunits. Subunits 13A, 13C, and 13D have a season from August 10 to March 31 with a daily bag limit of 10 and possession limit of 20. In contrast, subunits 13B and 13E have a more conservative season running from August 10 to February 15, though daily bag and possession limits remain the same across all subunits.

Two options have been proposed to increase ptarmigan hunting opportunities in subunits 13A, 13C, and 13D, but AITRC opposes both until more biological data is available to ensure ptarmigan populations remain sustainable. Additionally, warmer temperatures and increased snowmachine activity may be placing additional pressure on these populations. Consistent ptarmigan regulations across Unit 13 subunits are necessary to maintain clarity for hunters and sustainable management practices.

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PROPOSAL 63

5 AAC 85.065. Hunting seasons and bag limits for small game.

Require a registration permit to hunt ptarmigan in Units 13B and 13E:

AITRC opposes Proposal 63.

While we share the department's interest in obtaining more biological information about Unit 13 ptarmigan populations, AITRC opposes requiring a registration permit to harvest ptarmigan in subunits 13B and 13E, increasing the burden on hunters.

We understand that ptarmigan hunters' voluntary participation in providing biological samples to the department has been insufficient, preventing a thorough evaluation of population status and trends. To address this, AITRC supports enhancing outreach efforts to encourage greater hunter participation in voluntary sample collection. Additionally, we advocate for establishing ptarmigan-specific field surveys to gather the necessary biological information and compare population dynamics in heavily hunted areas with those in less impacted regions.

AITRC is also interested in collaborating with the department to obtain biological data. This could include joint fieldwork initiatives or partnerships to expand public outreach and increase participation in voluntary sample collection programs.

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Our Culture Unites Us; Our Land Sustains Us; Our People are Prosperous

December 27, 2024

Alaska Board of Game
PO Box 115526
Juneau, AK 99801

To members of the Alaska Board of Game:

On behalf of the shareholders of Ahtna, Incorporated ("Ahtna"), we are submitting the following comments on select proposals to be considered by the Board of Game at the Central & Southwest Region Meeting, January 10 - 17, 2025.

PROPOSAL 1: 5 AAC 92.015. Brown bear tag fee exemption.

Ahtna is in support of this proposal. Ahtna agrees that the liberalization of brown bear hunting regulations, including the tag fee exemption, helps to increase brown bear harvest which, in turn, may benefit the survival of moose and caribou calves. The Ahtna people rely on moose and caribou as a customary and traditional food source.

PROPOSAL 3: 5 AAC 92.080. Unlawful methods of taking game; exceptions.

Ahtna opposes this proposal. Ahtna feels that this would give hunters an unfair advantage over the game, and the use of wireless communication over bait is not necessary for a successful hunt.

PROPOSAL 4: 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Ahtna opposes this proposal. The sheep populations are declining across the state. There are already ample opportunities to hunt sheep. Given the statewide population decline, it is not advisable to open an additional hunt for Dall sheep currently. In addition, Ahtna agrees with the concerns of the Department that a July hunt may impede sheep surveys.

PROPOSALS 43 and 44: 5 AAC 85.045. Hunting seasons and bag limits for moose.

Proposals 43 and 44 would re-establish non-subsistence hunts for cow moose in Units 13A and 13C. Ahtna urges the Board to amend both proposals to make the cow moose hunts available for subsistence hunters rather than non-subsistence hunters. Any additional harvest opportunities for moose in Unit 13 should be allocated first to subsistence hunters.

There is a positive customary and traditional use finding for moose in Unit 13. Under Alaska's subsistence statute, the Board is required to ensure a priority for subsistence uses of fish and game.

However, as the Department has acknowledged, harvest success throughout Unit 13 has declined due to difficult moose hunting conditions and changing environmental conditions. The Board has also previously acknowledged the problem of increased competition among hunters for limited moose in Unit 13. There is widespread concern that the decreasing harvest success rates for subsistence hunters in Unit 13 may indicate that the current regulations may not provide a reasonable opportunity for subsistence.

Proposals 43 and 44 should be amended so that subsistence hunters who are not successful during the Copper Basin Community Subsistence Harvest Hunt (CSH) are provided with an additional opportunity to harvest. There is a long history of customary and traditional harvests of cow moose following unsuccessful bull moose hunts, including for religious ceremonial uses in Unit 13. Providing increased harvest opportunity to subsistence hunters who are dependent on the Unit 13 moose populations should be the Board's priority, rather than providing new and additional harvest opportunities for non-subsistence hunters who have other options for moose hunting throughout the state.

Alternatively, the Board should amend Proposals 43 and 44 to clarify that CSH participants may also participate in the cow moose hunts if they are unsuccessful during the normal CSH seasons. There is no reason why the additional harvest opportunity for cow moose in Unit 13 should not be provided first to subsistence hunters.

PROPOSAL 45: 5 AAC 85.045. Hunting seasons and bag limits for moose.

Ahtna opposes this proposal. Adding five additional days to the archery-only moose hunting in Unit 13 would cause additional pressure on the moose population in Unit 13. Further, the Ahtna people rely on the CSH to provide customary and traditional food for their villages. This proposal would cause additional undue competition with the CSH.

PROPOSAL 46: 5 AAC 85.045. Hunting seasons and bag limits for moose.

Ahtna strongly opposes this proposal. The regulation was originally adopted to ensure that the Ahtna villages were able to use their traditional hunting territory to meet subsistence nutritional and cultural needs, determined to be "community needs" rather than household or individual uses.

Ahtna went to great lengths and significant expense, and made vital concessions to establish the hunt. Ahtna worked with the Board of Game (Board) for years to try and come to some solution to game management in GMU 13 that would provide the opportunity necessary to continue their customary and traditional practices. Past Board findings recognized the hardships the Ahtna people have suffered for decades under state management. In fact, it was necessary to bring Ahtna's Traditional Chief, who was over 90 years old, and other Elders to testify before the Board regarding their customary and traditional hunting practices so that the Board could make findings and develop regulations establishing the CSH for the Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti-Kaah Community Harvest Area for moose and caribou. No other "community" had to prove this use.

It is disheartening to see this proposal brought to the Board now with a "neutral" recommendation from the Department after the significant efforts made by the Ahtna people, the Board, and other Alaska subsistence users to adopt this hunt. Further, this proposal does not indicate how it would satisfy the eight elements required to establish a customary and traditional use pattern consistent with the Board's findings. In contrast, the CSH is designed to provide opportunities for communities that meet those elements.

PROPOSAL 47: 5 AAC 85.045. Hunting seasons and bag limits for moose.

Ahtna opposes this proposal. Establishing a new, archery-only moose hunt in Units 13B and 13E would cause additional pressure on the moose population in Unit 13. Ahtna generally agrees with the Department that if late-season draw permits result in a decline in 13B bull-to-cow ratios, this could result in decreased any-bull quotas for the CM300 hunt.

PROPOSAL 48: 5 AAC 92.121. Intensive Management Plan V.

Ahtna strongly supports this proposal to assist in rebuilding the Nelchina caribou herd populations. The Nelchina caribou are a vital customary and traditional food source for the Ahtna people.

PROPOSAL 49: 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Ahtna strongly supports this proposal to assist in rebuilding the Nelchina caribou herd populations. The Nelchina caribou are a vital customary and traditional food source for the Ahtna people.

PROPOSAL 50: 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Ahtna opposes this proposal. The sheep populations are declining across the state. There are already ample opportunities to hunt sheep. The Department should be doing more to protect the sheep population for future generations.

PROPOSAL 51: 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Ahtna opposes this proposal. The sheep populations are declining across the state. There are already ample opportunities to hunt sheep. Given the population decline, it is not advisable to open an additional hunt for Dall sheep in Unit 11.

PROPOSAL 52: 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Ahtna opposes this proposal. The sheep populations are declining across the state. There are already ample opportunities to hunt sheep. Given the population decline, it is not advisable to open an additional hunt for Dall sheep in Unit 11.

PROPOSAL 53: 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Ahtna opposes this proposal. The sheep populations are declining across the state. There are already ample opportunities to hunt sheep. Given the population decline, it is not advisable to open an additional hunt for Dall sheep in Unit 13D.

PROPOSAL 56: 5 AAC 85.040. Hunting seasons and bag limits for goat.

Ahtna opposes this proposal. Given the population decline, it is not advisable to open an additional registration goat hunt in Units 13D and 11.

PROPOSAL 57: 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Ahtna is in support of this proposal. The increase of bag limits for brown bear in Unit 13 will help to increase brown bear harvest which, in turn, may benefit the survival of moose and caribou calves. The Ahtna people rely on moose and caribou as a customary and traditional food source.

PROPOSAL 58: 5 AAC 92.121. Intensive Management Plan V.

Ahtna strongly supports this proposal. Reducing the minimum wolf population in the Unit 13 Intensive Management Plan will assist in rebuilding the Nelchina caribou herd populations. The Nelchina caribou are a vital customary and traditional food source for the Ahtna people.

PROPOSAL 61: 5 AAC 85.065 Hunting seasons and bag limits for small game.

Ahtna supports this proposal. A delay in the start date for the ptarmigan hunting season in Unit 13B will help ensure a stable population, especially around areas accessible from the road system.

PROPOSAL 62: 5 AAC 85.065. Hunting seasons and bag limits for small game.

Ahtna opposes this proposal. Ahtna agrees with the Department that extending the spring hunting season for ptarmigan in Units 13A, 13C, and 13D may create a substantial reduction in the number of breeding individuals around areas accessible from the road system.

Sincerely,

Nicholas Jackson, Board Chair
Ahtna, Incorporated

Alaska Migratory Bird Co-Management Council Native Caucus

U.S. Fish & Wildlife Service

Alaska Department of Fish & Game

Aleutian-Pribilof Islands Association

Association of Village Council Presidents

Bristol Bay Native Association

Chugach Regional Resources Commission

Ahtna Inter-Tribal Resource Commission

Kawerak, Inc.

Maniilaq Association

North Slope Borough

Sun'aq Tribe of Kodiak

Tanana Chiefs Conference

DATE: December 26, 2024

TO: Mr. Stosh Hoffman, Chair, and Members of the Alaska Board of Game

FROM: Randy Mayo, Chair, Alaska Native Caucus
Alaska Migratory Bird Co-Management Council

RE: OPPOSITION to Proposal 23 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Lengthen the nonresident hunting season for Emperor geese in Units 9 and 10, and increase the number of permits allocated to nonresident hunters.

The Native Caucus of the Alaska Migratory Bird Co-Management Council (AMBCC), comprised of ten Alaska Native representatives from across the state, hereby OPPOSES Proposal 23. There is a positive customary and traditional use determination adopted by the Alaska Board of Game for migratory birds in all units with a harvestable surplus (5 AAC 99.025(a)(12)(I)). The Native Caucus feels it is inappropriate at this time to consider this proposal, given the impending closure of subsistence opportunities to take Emperor geese, and the fact that this proposal would increase allocation and harvest opportunities for non-subsistence users.

The AMBCC has an Emperor Goose Management Plan in place, which is a companion plan to the Pacific Flyway Emperor Goose Management Plan. According to the harvest strategy in both plans, the population index has reached the threshold for statewide closure of Emperor Geese, so both the subsistence hunt and the sport hunt will be closed in 2025. This species will remain closed to harvest until the population increases to a point where harvest can again be considered by the AMBCC.

Attached is an excerpt from the AMBCC Emperor Goose Management Plan that describes in more detail the Harvest Management Plan, the population thresholds, and the action required when a particular threshold is reached.

One of AMBCC's primary goals is to maintain healthy bird populations, including those of conservation concern. The Emperor Goose is a species of conservation concern due to their low population numbers. Threats to the Emperor Goose include noise disturbance, spills and pollution, climate change, and predation and hunting. As you can see, hunting is not the only threat to the Emperor geese population, but closing harvest is one strategy we can use to conserve the species. Hunting responsibly is one of the few actions that can help the Emperor Goose now and preserve hunting opportunities for the future.

Emperor Geese are a sensitive species; laying 2-8 eggs with one brood maximum per year. The goslings leave the nest within 24 hours after hatching, so are prime targets for predators, like gulls, jaegers, and foxes. Their populations grow slower than most other goose species, so we must take steps to avoid over-harvest to ensure healthy future populations. In addition, Emperor Geese are easily disturbed by humans, and the effects of climate change (sea level rise, increased salinity, and coast inundating) are likely to alter nesting and brood rearing habitats and may impact Emperor Goose productivity and gosling survival.

It is for these reasons that the Native Caucus strongly recommends that the Alaska Board of Game DO NOT PASS proposal 23.

Thank you for the opportunity to provide comments.

Excerpt from the Alaska Migratory Bird Co-Management Council Emperor Goose Management Plan, page 8, Harvest Strategy, Adopted September 2016

HARVEST STRATEGY

The harvest strategy is based on using a total bird index from the YKD Coastal Zone Survey to assess population status relative to a regulatory harvest threshold (see Figure below). The total bird index is a relative measure of population size based on the number of geese detected from aerial surveys on the YKD during the early nesting period.

Based on the total bird index, the harvest strategy defines a regulatory harvest closure threshold of 23,000 birds. This represents approximately 120,000 emperor geese based on a theta-logistic population model currently in development (USFWS, R7-Migratory Bird Management). The most recent three-year (2014–2016) average population index is 30,965 birds; representing approximately 161,000 emperor geese. The theta-logistic model and associated analysis was used to derive the optimal harvest threshold which helped guide the selection of the harvest closure threshold.

The term of this harvest strategy is the period of 2017-2021. However, during the 3-year period (2017–2019) following implementation, the Subcommittee will annually review available data (e.g., harvest survey data, population status and trend, and other relevant information) and consider the need for conservation measures (see below). After 2019, the Subcommittee will conduct a thorough analysis of the available data to determine efficacy of the harvest strategy and will consider alternative strategies if warranted. Alternatives will be considered as amendments to the Management Plan and be effective for the remainder of the five-year term. The spring/summer subsistence harvest strategy is complementary to the fall/winter harvest strategy included in the Pacific Flyway Emperor Goose Management Plan. In recognition that emperor geese are a shared resource, the AMBCC has established the following spring/summer subsistence harvest guidelines:

1. The harvest strategy seeks to maintain a population of emperor geese above an index of 23,000 birds based on the total bird index from the most recent YKD Coastal Zone Survey.
2. If the total bird index from the previous year is greater than 23,000 birds then spring/summer subsistence harvest of emperor geese will be open to customary and traditional practices during the open seasons for migratory bird harvest (see Table below).
3. If the total bird index from the previous year drops below 28,000 birds, the AMBCC will consider implementing conservation measures that include: increased outreach and education programs, reduced season length (e.g., 2-week harvest season), extension of the 30-day closure, cessation of egg collection, limiting hunting to elder and ceremonial harvest only, or other measures as identified by the parties to this Management Plan.
4. If the total bird index from the previous year is less than 23,000 birds, then emperor goose hunting will be closed.

PC6

Name: Rod Arno,, Alaska Outdoor Council

Community of Residence: Palmer, Alaska

Comment:

Alaska Outdoor Council

PO Box 870370

Wasilla, Alaska 99687

RE: Alaska Outdoor Council comments on proposals up for deliberations by the Ak Board of Game January 2025.

The Alaska Outdoor Council (AOC) represents thousands of Alaskans who hunt, trap, fish, and recreate on both state and federal lands and waters in Alaska. AOC has had paid representation at the AK Board of Game (Board) regulatory meetings for decades. AOC's positions on proposals being deliberated on by the Board are worth being considered by the Board and required by Alaska State Constitution, Article 8, Natural Resources, Section 4, Sustained Yield. AOC represents a group of beneficial users of game.

AOC supports proposals #1 through #3. These proposals all could help reallocate moose and caribou to Alaskan hunters consistent with AS 16.05.255(e). ADF&G has not determined that adoption of proposals 1, 2, 3 by the Board would lead to concerns regarding conservation of bear populations in the proposed GMUs.

AOC opposes adoption of Proposals #28, #39, #40, #41, #42. These proposals all choose to reduce expectations of higher harvestable surplus of moose and/or caribou for human harvest in areas of high human use of harvestable game. Reaching the population and harvest goals of game allocated to Alaskans for consumptive use, AS 16.05.255(d), on a sustainable level is consistent with the Alaska State Constitution Article 8, Sections 1 through 4. AOC members who make gathering a wildfood harvest part of their lifestyle would like the Department to achieve current moose populations and harvest objectives in these GMUs with high human demand to harvest publicly owned game for human consumption.

AOC opposes adoption of Proposal #46. Off High Vehicle (OHV) use to take and retrieve moose in GMU13 has a multi-generational record of use. AOC prefers the Board repealing the CSH 5 AAC 92.074(d) and implement a Tier II permit moose hunt for state Subsistence users if ANSfor moose in GMU13 is not being achieved

AOC opposes adoption of Proposals #30 and #49. The Board of Game can not stockpile harvestable game. Consistent with AS 16.05.258 the Board can allocate any available harvest of moose to subsistence users based on the criteria found in 5 AAC 99.010(b) under the Subsistence Tier II permit system. AOC recommends the Board follow the state subsistence law AS 16.05.258(b)(4) of reducing harvest opportunities before adopting compete closures to harvest.

AOC supports adoption on Proposal #82. AS 16.05.255(a)(13) gives the Board clear authority to adopt a means and methods regulation to help reduce the conflict between dog owners and trappers at the edge of urbanization in South Central Alaska.

PC7

Name: Thor Stacey, Alaska Professional Hunters Association

Community of Residence: Juneau

Comment:

December 27th, 2024

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the January meeting in Wasilla. The APHA's members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. 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 the Central and Southwest Region 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.

Individual Proposal Comments:

Proposal 4- OPPOSE

The APHA opposes prop 4 even though it offers expanded guiding opportunity for dall sheep in the Central/Southwest region. Current hunting seasons, especially in September, allow for robust hunting opportunity for all hunters. Data shows the majority of hunting effort and harvest occurs in the first week of rifle season. Many sheep harvested were legal and available to be harvested in prior years according to department data. Proposal 4 does not discuss why bow hunters need special season to be successful when most of the sheep hunting season has relatively low hunter effort, especially in September. Creating a special archery season before the general season could easily be exploited by hunters who transition from bow hunting to rifle hunting in ways the author may likely does not intend. Proposal 4 adds hunting effort at a time when dall sheep populations have declined statewide. Expanding dall sheep hunting in one region for one specific method and means is not warranted at this time. The department OPPOSES expanding the season into July because of likely conflict with ongoing sheep population surveys and hunting activity in the field.

Proposal 7- SUPPORT

The APHA supports prop. 7 based on comments by the department. Hunting guides in the area are cautious about harvesting October caribou however there are certain circumstances where this should be allowed to achieve conservation goals.

Proposal 8- SUPPORT

The APHA supports Prop. 8 because it is necessary to legally allow reindeer hunting on Umnak Island. Failure to pass Prop. 8 will disadvantage residents of Umnak Island, traveling hunters and frustrate achieving population harvest objectives on a small island vulnerable to habit loss and/or destruction. We note the excellent survey and inventory data provided by a private party that accompanies this proposal.

Background:

Limited outfitting and guiding for reindeer on Umnak Island has occurred historically. Hunts for introduced reindeer are reported to bring value to the local community and generate six local jobs in a small community of approximately 40 residents. Reindeer were introduced to Umnak Island where they have persisted for over 40 years. Reindeer on Umnak Island enjoy a predator free environment but are constrained by habitat and prone to large population crashes. Human hunting of reindeer is essential to manager reindeer. Sale of reindeer meat, antlers and hides has not been economically viable on Umnak Island for some time. Currently reindeer are not listed as a game, exotic or invasive animals. Defining reindeer for regulatory purposes is necessary to legally allow hunting for them in Alaska. The APHA is unaware of any entity that can claim title to reindeer on Umnak Island making them free range exotics.

Guiding and Rural Economy:

Guided or outfitted hunts on Umnak Island offers the perfect example of the type of benefits guiding brings to rural communities. Subsistence needs are being met by local residents by harvesting from the abundance of exotic reindeer, cattle, domestic-introduced sheep, fish and fowl. Reindeer are currently so abundant additional harvest beyond what is needed for local consumption is necessary to manage the herd. Access to Umnak is expensive and difficult. Visiting hunters offer a win/win for the community by paying for lodging, local guiding and transportation services. Much of the reindeer range is on private native corporation lands so trespass fees are also levied. In an economically challenged, extremely remote setting like Umnak Island allowing for hunting of a local resource by paying customers makes sense. The APHA is a strong proponent of rural economy and supports reindeer hunting where it bring holistic benefits, not the least of which are economic, to remote communities.

Summary:

Passing Prop. 8 makes sense for a whole host of reasons. Failing to pass Prop. 8 would make waste of a valuable community opportunity provided by an introduced exotic animal that should be harvested at a sufficient rate to protect Island habitats. Failure to pass Prop. 8 would diminish the health and livelihoods of residents in an already difficult part of the state to make a living. Proposal 8 is all about community viability and common sense management using visiting hunters as a tool to achieve desired outcomes.

Proposal 9- SUPPORT

The APHA strongly supports Proposal 9.

Background:

During the 2018 Dillingham meeting the department expressed concerns about increased average age and skull size of bears in the harvest reports. Guides also reported some mortality event had occurred around 2012-13. However the guiding community was split as to whether or not to support shortened fall and spring seasons. During the 2018 meeting guides, the board and the department worked together to decide what to do about what appeared to be missing recruitments and potentially a “bubble” developing in the bear population recruitments did not improve. Over the objections of many long tenured guides who operated in Unit 9 the APHA reluctantly supported shortening both the spring and fall bear seasons. Harvest data no suggests the shortened seasons were unnecessary and the cautious approach to bear harvest in especially 9D&E was unwarranted.

Fall Season:

Brown bear season on the peninsula historically has been designed to provide a sufficient time period between moose season and bear season to minimize the value of moose gut piles to bear hunting. Starting the season on October 1st achieves this goal while minimizing the burden on guides who incur large expenses transporting their workforce to and from the field. Starting the season on October 7th diminished the value of brown bear hunts to guides because they must either pay their workforce for an additional week of work, without a hunting season, or fly guides to town and then fly them back out to the field. Both scenarios offer challenges for contracting guides and their workforce thus diminishing the value of the fall seasons. Harvest data shows starting the fall season on October 7th has not reduced the incidence of sow harvest as some theorized might occur. Instead harvest rates of both males and females have remained steady even with a later bear season starting date.

Adopting Proposal 9 will add value to guided hunting opportunities by reducing transportation cost to and from the field. Moving the fall season to an earlier start date will not create conservation concerns.

Spring Season:

Traditionally bear hunting improves later in May and in some years the last seven days of the season is when most of the bear harvest occurs. This effect is especially noticeable on colder than average springs like Alaska has been experiencing for a decade. While harvest rates have remained relatively steady with the shortened seasons, guides report more difficulty putting on a quality hunt during the spring for clients who are traveling great distances and paying premium prices to hunt brown bears on the Alaska Peninsula. Lengthening the spring season will again allow guides to offer extended, high quality wilderness hunts while keeping their workforce employed for a longer period. Because most hunting guides are Alaskans and most of the benefits derived from guided hunting are realized in rural areas, lengthening the season will bring more value from this important allocation. According to the department lengthening the spring season again will not result in conservation concerns.

Conservation:

For many many years bear hunting on the peninsula was managed in essentially a static but successful manner. Bear harvest numbers have remained steady while average skull size has shown a slightly increasing trend over the past twenty years. Average age at harvest has oscillated but also shows a very slight increasing trend over the long-term. In 2018 concerns arose leading to a shortened spring and fall season. Looking at the data it appears the shortened season only diminished the value of the bear hunting opportunities for guides but did not result in any measurable conservation benefit. Currently the guides report good numbers of cubs with a few less older age-class bears to harvest. Harvest reports offer data that corroborates these observations. Passing proposal 9 will not create conservation problems, the shortened seasons did not result in a measurable benefit to the bear population.

Summary:

The APHA urges the board to pass Prop. 9 after taking into consideration whether or not the departments concerns about subsistence opportunity require and amendment.

Proposals 10,11,12, 13, 14, 15, 16, 17 and 18 - OPPOSE

Based on the APHA’s support for Prop. 9 we OPPOSE Props. 10,11,12, 13, 14, 15, 16, 17 and 18. Many of these proposals do not have a conservation benefit or do not add to the value of current opportunities. Proposal 9 is the APHA's preferred change to GMU 9 brown bear seasons.

Proposal 34- OPPOSE

The APHA is opposed to expanding brown bear hunting methods and means to allow the take of bears "same day airborne" in GMU 17. While same day airborne hunting is allowed for deer and bear baiting in some units in the state these opportunities do not afford an airborne hunter to select a specific animal for harvest. In the deer and bear baiting examples the airplane is more akin to land base transport to transit to the hunting location selected. Use of airplanes to specifically select an animal runs counter to the APHA fair chase code of ethics. Brown bears are iconic big game animals and even where they are abundant like they are in many portions of GMU 17 should not be hunted same day airborne unless part of a predator control program or restricted to bait stations.

The APHA strongly OPPOSES Proposal 34.

Proposal 48- SUPPORT

The APHA supports proposal 48 based on the department's comments. Guides expressed support for predator management in this area and feel it will assist ungulate populations recovery.

Proposal 51 & 52- OPPOSE

The APHA STRONGLY opposes Props. 51 & 52. Both proposals single out a small portion of GMU 11 to create a resident only hunting block. Neither of these proposals are offered in good faith and both appear to be singularly directed at the one and only guide permitted to hunt in the area of MacColl Ridge.

Background:

MacColl Ridge is wholly located within the Wrangel St. Elias National Park Preserve. This area is allows guided hunting of nonresident hunters and is managed by federal concession. Only one guide is permitted to operate in this area and his base of operations is a lodge directly adjacent to the MacColl Ridge feature. Guided nonresident hunting has occurred in sustainable levels of effort pre-dating statehood in what is now a National Park Preserve CUA. While the guide in the area may hunt in other areas within his concession it is reported the use of MacColl ridge remain important to his livelihood. The guide has in fact lived on the Chitna River his entire life and participates in predator hunts depending on the year and season. It stands to reason his participation in wolf harvest and careful management of sheep hunting opportunity he offers has in fact benefitted sheep in the areas he hunts. Harvest data shows a relatively stable situation with most of the sheep harvested in GMU 11 being taken by resident hunters. In fact resident hunters take, on average, 75-80% of the sheep harvested in GMU 11. Singling out nonresident effort and take in a tiny, but highly valued for the guide in the area, for a resident restriction is without precedent.

Conflicts and Dispersed Effort:

Passage of Props. 51 & 52 will only serve to push guided effort out to other portions of GMU 11 and will effectively "take" opportunity from a local resident guide who has utilized this area historically. There will not be any conservation benefit, whatsoever brought by passing these proposals. If anything, it will spur MORE sheep hunting in the small portion of GMU 11 closed to nonresidents. So it won't be good for the sheep. If anything, passage of these proposals would result in a slap in the face to conscientious steward of the area who has worked hard to manage harvest in a way that benefits the sheep. Conflicts will arise because the base of operations, a fixed lodge in-holding in the Preserve will sadly elevate because it is literally at the base of MacColl ridge.

Summary:

The APHA urges the board to FAIL these targeted proposals. GMU 11 is a great place for residents to hunt sheep, with the bulk of the harvest being taken by nonguided hunters. Singling out a small portion of the GMU 11 to close to nonresidents is in appropriate at best.

Proposal 53- OPPOSE

The APHA opposes prop. 53 because now is not the time to be adding additional sheep hunting seasons with populations at near all-time lows.

Proposal 54- SUPPORT

The APHA supports Prop. 54 because full curl management is a more conservative approach to managing hunting and guides in this area report a struggling sheep population.

Proposal 55- SUPPORT

The APHA supports Prop 55 because it will spread the pressure out in the drawing unit and result in harvest being dispersed over a larger area and likely more hunting opportunity in the near and long-term.

Proposal 56- OPPOSE

The APHA opposes Prop. 56 because creating an additional weapons restricted hunt is not warranted at this time in this unit.

Proposal 73- OPPOSE

The APHA opposes Prop. 73 because full curl management is a more conservative approach to sheep management than “any ram” managed under a quota. At this time the APHA prefers a more conservative approach to sheep harvest management given sheep population trajectories.

Proposal 74 – OPPOSE

The APHA opposes Prop. 74 because creating a weapon restricted hunt is not warranted at this time and will be enjoyed by a very small subset of the hunting community.

Proposal 76 – OPPOSE

The APHA opposes Prop. 76 because taking brown bears the same day airborne is not a fair chase hunting practice. Take of brown bears the same day airborne should be considered if part of an intensive management program and is innocuous when accessing bait stations. Using airplanes to target individual bears is a likely outcome if Prop. 76 is passed. The APHA’s code of ethics promotes fair chase hunting thus we strongly oppose Prop. 76.

ALASKA WILDLIFE ALLIANCE

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Dear members of the Board of Game,

On behalf of the Alaska Wildlife Alliance membership, staff, and Board, we submit the following comments on 2024/2205 Central and Southwest proposals:

Proposal 2: Open two bear baiting seasons in Units 9, 11, 13, 14B, 14C, 16, and 17 where bear baiting is legal - **OPPOSE**

- Each unit and sub-unit has varying conditions, bear survey information and hunter effort, and should thus have bear management decisions made individually, not as a block.

Proposal 3: Allow the use of cellular cameras for the taking black bear and brown bear over bait in Unit 9, 11, 13, 14B, 16, and 17 - **OPPOSE**

- In 2017, the Board voted not to allow this technology at the Statewide meeting to "ensure fair chase" (AWT comments on Prop 3). We believe the Board should affirm the 2017 decision for the same reason.
- Not allowing this technology is common practice in other states with high hunter participation. Arizona and Nevada have banned the use of trail cameras for hunting purposes. Montana, Utah, Kansas and New Hampshire have also prohibited the use of wireless or cellular cameras during hunting season (matching Alaska's current statewide rule). Arizona, Delaware, Kansas, and Utah recently banned cameras on public lands, and even Kentucky is considering a ban on trail cameras for public-land hunting. These bans are on SD and cellular cameras alike.

Proposal 9: Lengthen spring and fall brown bear hunting seasons in all of Unit 9 to October 1–October 21 and May 10–May 31- **OPPOSE**

- Unit 9 bear management is complicated, and Unit uses, hunting pressure and wildlife viewing pressure differ dramatically between subunits. While we understand the interest of regulatory simplicity, 9 A, B and C should be managed very differently from 9E and 9D.

Proposal 11: Shorten spring and fall hunting seasons by 1 week (back to previous length) in 9C to Oct 7-21 and May 10-25 - **SUPPORT**

- This proposal would not change the number of bears available for hunting, but would alter the season to reduce user conflicts.
- Katmai is arguably the most famous bear viewing area in Alaska, and possibly the world. Reducing hunter, wildlife viewer and sport fisher conflicts in this highly visible and well-travelled area was a wise decision by the Board, and should be repeated now.

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Proposal 22: Shorten the season for hunting wolverine in Unit 9 for both residents and nonresidents - **SUPPORT**

- This would shorten the season by one month to coincide with the trapping season, which makes sense.
- We support removing hunting pressure during the breeding period.
- ADFG has no population data for wolverines, but harvest has decreased from avg 30 to 17 per year since 2010.

Proposal 23: Lengthen the nonresident hunting season for Emperor geese in Units 9 and 10, and increase the number of permits allocated to nonresident hunters - **OPPOSE**

- The 2025 fall-winter hunt of emperor geese is closed due to low population status in agreement with the management plans.
- If there was a harvestable surplus, it should go first to residents, not non-residents.

Proposal 24: Close the season for Alaska hares in Units 9 and 17- **SUPPORT**

- We share ADF&Gs concerns about low hare abundance.

Proposal 28: Reduce population and harvest objectives for moose in 17B- **SUPPORT**

- We support realistic population and harvest objectives.
- The current population objective is unrealistic given the estimated moose habitat and desired density of moose. Adjusting management objectives is appropriate due to current and historic data that determine current goals are unlikely to ever be met and have no history of being met.

Proposal 29: Review population and harvest objectives for Mulchatna Caribou Herd - **SUPPORT**

- We support realistic population and harvest objectives.
- Given the changes in climate and disease facing this herd, we think it extremely important that these objectives be reviewed, and would support a reduction in both objectives.
- It does not matter how many predators the State kills, or how long hunting is closed- this herd is most greatly impacted by climate changes that reduce nutritional quality and disease. Neither of those variables are likely to change in the near future; it does not make sense to manage to unattainable goals.

Proposal 30: Implement a 3 -year moratorium on caribou hunting in Units 9B, 17, and 19A&B - **SUPPORT**

- Hunting of the MCH under RC503 has been closed by Emergency Order for the last three years and is not expected to occur until a sizable harvestable surplus is found. Given the condition of MCH, this is highly unlikely in the next three years.
- The predator control program is approved through 2028. ADFG recommends "hunting should be avoided while the department conducts a lethal predator removal program."
- We generally oppose management by emergency order, and seek management plans that do not rely on emergency orders; management should strive to be sustainable year-to-year.
- This would align regulations across the range of MCH after adoption of a 4-year moratorium in Unit 18 at the 2024 Arctic/Western Region BOG meeting in Kotzebue.

Proposal 31: Close the resident caribou season in 9B, 17, and 19A & 19B for the Mulchatna caribou herd until population numbers have met or exceeded the 30,000 threshold to harvest- **SUPPORT with amendment**

- Clarify that the closure is for residents and nonresidents.
- Hopefully the Board will have passed proposal 29, and will amend the "30,000 threshold" to a new, more realistic population objective.

Proposal 32: Allow year-round killing of brown bear in 17- **OPPOSE**

- ADFG is already aerially gunning bears with no bear abundance estimate or pre-control metrics on the impacts of bear control. Further liberalizing bear harvest in Unit 17 is too great a liberalization, given that ADFG has almost no data on bears in this Unit.
- We believe that every species needs a rest from arvest and do not support no-closed seasons, especially on species with low reproductive rates.

Proposal 33 and 34: Allow same day airborne killing of brown bear (33 and 34) and wolves (34) in Unit 17 - **OPPOSE**

- Take of wolves in Unit 17 same day airborne is prohibited by statute unless under permit issued under an IM program.
- The State is already aerially gunning wolves with almost no wolf abundance data.
- Further liberalization on wolf harvest in Unit 17 is, we believe, unethical given the lack of wolf data.

Proposal 35 and 36: Shorten trapping season in 9 and 17 to the last day of February (35), shorten hunting in 17 to Sept 1-Feb 29 (36) - **SUPPORT**

- **The current May 31 date allows killing females during the denning period, which we oppose.**

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Proposal 39: Reduce population and harvest objectives for moose in 13B- **SUPPORT**

- We agree with Department comments, "Public comments and values should guide the ultimate objectives for moose abundance in Unit 13B, but biological evidence, such as long-term abundance indices from minimum population counts and measures of productivity, suggests that objectives should not be higher than 5,500 moose at this time."
- We support realistic management objectives.
- We appreciate the Department seeking to stabilize the moose population below historic peaks that are most likely not sustainable.

Proposal 40: Change population objective for moose in 13C - **OPPOSE**

- This proposal makes the minimum and maximum objective more narrow, effectively raising the minimum but 500 moose and the maximum but 250. The current population objective seems viable for the area.
- Given that ADFG proposed lowering the harvest objective in this Unit, we believe a population objective increase is not prudent at this time.

Proposal 41: Reduce harvest objective for moose in 13C - **SUPPORT**

- We have not met the current minimum harvest objective since the mid-90s. We have never gotten close to the current high harvest objective (350) - the closest was in the late 1980s when harvest reached ~200.
- While we do not seek to reduce subsistence opportunities, the current harvest objectives are not attainable and back managers into a corner to continually fail at achieving unrealistic goals.
- The proposal change (80-200) provides a realistic lower harvest objective while also capturing the max harvest recorded in the late 1980s; this range creates a sustainable bottom harvest and reflects what could possibly be realistic at the highest harvest objective.
- 350 as an upper harvest objective, based on historical information, never seemed viable. 200 is much more reasonable, and reflects this highest documented harvest.

Proposal 42: Reduce harvest objectives for moose in 13E - **SUPPORT**

- We support realistic goals for unit management and believe this proposal would make 13E harvest objectives realistically achievable.

Proposal 48: Modify the intensive management plan for Unit 13 to include Nelchina caribou - **OPPOSE**

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Proposal 49: Close caribou hunting for six years or until the herd reaches the midpoint of the management objective of 37,500- **SUPPORT**

Comments on Proposals 50-54 and Proposal 56 (Unit 13 sheep)

- Given the current decline in dall sheep, and projected losses in habitat due to climate change, we oppose new or expanded seasons on sheep that increase total harvest. For areas with limited tags but extended seasons, we have no opinion. In short, the total number of sheep harvested should not increase.

Proposal 57: Increase the bag limit for brown bear in Unit 13 from one to two - **OPPOSE**

- In Denali State Park season is Aug 10 - June 15, and in 13 remainder there is no closed season. We have not seen bear abundance estimates from the State, but believe this season is already very liberal (no closed season) and does not need a bag limit increase.

Proposal 58: Reduce the minimum wolf population in Unit 13's Intensive Management plan to 100- **OPPOSE**

- This would significantly lower the population below historical numbers, and create an unrealistic removal goal.
- We disagree with the assumption that a reduction in wolves increases moose over any mid-long term time frame.
- Before reducing the wolf population goal (135-165), we should first measure the impacts of the current population goal (both in impacts to prey and predator populations and in feasibility of removal).

Proposal 59 and 60: Lengthen wolf (59) and/or coyote (60) trapping season in 13 and 11- **OPPOSE**

- This would add 56 days to the trapping season and would would allow trapping during breeding season.
- Fur will not be prime during the proposed season extension and pelts are not likely to be as valuable if harvested during the extended season dates.

Proposal 63: Require a registration permit to hunt ptarmigan in Units 13B and 13E - **SUPPORT**

- Units 13B and 13E face heavy hunting pressure for ptarmigan, especially with the amount of motorized vehicle access along the Denali Highway and the popularity off-road vehicles and snowmachines.

- Harvest estimates are a vital component of effective management of any hunted species (especially a popular species). However, the department currently does not require any kind of harvest or hunter effort data.
- The Board has restricted the ptarmigan season to address potential conservation concerns, but has not done so with harvest data. Collecting this information would greatly support sustainable management of ptarmigan in this heavily trafficked area.

Proposals 70 and 77: Extend the hunting season for brown bear in Units 14A and 14B from May 31 to June 15- **OPPOSE:**

- This would add 15 days at the end of the current bear season (including at bait stations), which is "expected to result in an increased harvest of brown bears".
- The brown bear management objective is to maintain a population that can sustain an annual harvest of 25 bears composed of at least 50% males. The 10-year average harvest from RY13–RY22 was 20 bears and the average percent of males was 57%. The percentage of male harvest has already exceeded the management goal, and the annual harvest is very close to the 25 bear goal. Should the Board pass this proposal, we strongly recommend ADFG tracking harvest closely to determine if harvest exceeds the 25 bear goal, and share those findings with the public and the Board at the 2028 meeting.
- Given the RY13-RY22 harvest records, we could argue that the current season is working to maintain the goal population and should not be changed.

Proposal 71: Extend the brown bear hunting season in Unit 14B by 30 days from May 31 to June 30- **OPPOSE**

- This proposal would add 30 days at the end of the current bear season (including at bait stations), which is "expected to result in an increased harvest of brown bears".
- The brown bear management objective is to maintain a population that can sustain an annual harvest of 25 bears composed of at least 50% males. The 10-year average harvest from RY13–RY22 was 20 bears and the average percent of males was 57%. The percentage of male harvest has already exceeded the management goal, and the annual harvest is very close to the 25 bear goal. Should the Board pass this proposal, we strongly recommend ADFG tracking harvest closely to determine if harvest exceeds the 25 bear goal, and share those findings with the public and the Board at the 2028 meeting.
- Given the RY13-RY22 harvest records, we could argue that the current season is working to maintain the goal population and should not be changed.

Proposal 72: Eliminate the harvest ticket requirement for hunting black bear in Unit 16- **OPPOSE**

- Keeping consistent regulations through time and across commonly traveled boundaries reduces confusion and prevents common violations.

- **Hunter effort and location data for unsuccessful hunters can be a useful metric in determining management strategies, which is important in areas that are particularly difficult to survey, such as this.**

Proposal 75: Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan- **OPPOSE**

- Alaska's predator control programs — aimed at boosting moose, caribou, and deer populations for hunters — **do not work to increase human moose harvest**. A 2022 article by ADFG and University of Alaska Fairbanks biologists published in the scientific journal Diversity, found no increase in moose harvests in the years following nearly 40 years of predator control in Southcentral Alaska. Listen to an interview with the author here.
- Large carnivore management in Alaska is a reversion to outdated management concepts and occurs without effective monitoring programs designed to scientifically evaluate impacts on predator populations, or identify causal relationships between predator control and prey population dynamics. Large carnivore management in Alaska **should be based on rigorous science including the status and trends of carnivore populations - this program does not meet those standards.** Read more in the 2019 article, *Large carnivores under assault in Alaska*, which was authored by three Alaska state and federal wildlife biologists.
- The proposed aerial gunning program borders some of the most iconic wildlife viewing areas in the world. **Predator control is not popular with the general public**. The State's reputation as a responsible wildlife manager is rightfully beginning to sour after aerially gunning down nearly 200 bears in southwestern Alaska. Authorizing this program on such loose and un-studied biological grounds bruises Alaska's image and erodes public faith in the Board of Game to make sustainable decisions.
- By ADFG's own admission: "Adoption of **this proposal would result in significant costs to the department** if department staff conduct control activities" (ADFG comments on Prop 75, Page 224). The Intensive Management program against bears and wolves a few hundred miles west cost $231,000 in 2022 and $612,000 in 2023 (page 14, 2024 annual report to Board of Game) Predator control as a whole has accounted for ~$2.5 million in lost federal funding, as Pitman Roberts funds cannot be used for Intensive management. It is unwise to dedicate another quarter million dollars each year to predator control programs that have yet to be deemed effective.
- In their proposal, ADFG states that "the department has no plans to activate bear control at this time", yet the State has a track record of authorizing bear control programs without a proposal, and of authorizing bear control in this game unit. **The Department would not ask for the authority to aerially gun both wolves and bears unless they had the private inclination to add bear control within the next three years.** This lack of transparency erodes trust, and cuts the public out of important deliberations.

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- If approved, this proposal would give ADFG full reign to implement an aerial gunning plan in Unit 16. Once a proposal like this is approved, ADFG has the authority to develop an Operational Plan for aerial gunning that is not open to public or Board input.
- AWA's Position Paper on Predator Control and Intensive Management clearly lays out our position on these programs, as well as our recommendations.

Proposal 76: Allow the take of brown bear in Unit 16, the same day airborne - **OPPOSE**

- **Unit 16 brown bears are frequently targeted in the spring while snow allows for locating tracks and animals from the air. Snow and ice provide benefits for air access to locations that are not typically accessible to aircraft in snow free periods.**
- **If adopted, this proposal would allow hunters to hunt brown bears the same day they have flown in Unit 16B outside of the restricted area. This specifically allows the practice of spotting brown bears from the air and then landing to pursue them. It will also provide the opportunity to harvest bears that were not seen from the air but were encountered the day that the hunter flew into the unit. These practices violate fair chase.**
- **Adoption of this proposal is expected to increase the harvest of brown bears, which we oppose.**

Proposal 78: Allow the same day airborne take of wolves in the active, Unit 16 Intensive Management Plan- **OPPOSE**

- **The board does not have the authority to allow what the proponent is requesting because statute prohibits the take of wolves the same day a person has been airborne unless under the conditions of a permit issued as part of an intensive management program.**

Proposal 79: Extend the wolf trapping season in Unit 14A by 30 days- **OPPOSE**

- **The current hunting season allows for the take of wolves during the proposed dates, without the use of traps or snares. Extending the trapping season could potentially result in the incidental trapping of other species.**
- **We oppose trapping into the breeding season when furs are of poor quality.**

Proposal 80: Require sealing of beaver taken in Unit 16- **SUPPORT**

- **Additional harvest information would be helpful to understand current beaver populations.**
- **We recognize that sealing may be cumbersome for some remote residents, but given that this was proposed by the Mt. Yenlo AC, we believe enough rural users want this information to make sealing worthwhile.**

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Proposal 82: Establish 50-yard trapping setbacks along specific trails in Unit 14.

SUPPORT

- We support this for the reasons stated in the proposal.
- Alaska Trappers Association also supports this proposal.
- Alaska Wildlife Troopers submitted thoughtful comments on this proposal, which we respond to below:

"Without trap identification requirements, enforcement of this would be all but impossible for Wildlife Troopers. Urban and highly populated areas such as the Matanuska Susitna Borough draw a wide variety of individuals and often several trappers will operate in close proximity with no established trapline "belonging" to an individual. Without trap identification requirements a trap found in violation would require a Trooper to monitor that trap nearly constantly until a person returned and claimed ownership." We agree that this is a regulatory issue and we support trap identification requirements. We were disappointed that the Board removed them and believe trap ID requirements would support AWT in being able to effectively regulate trapping. That being said, trap setback regulations exist in Juneau and in portions of 15C (Kachemak Bay State Park) without ID requirements. While we agree that this regulation cannot be easily managed without ID requirements, this should not disqualify this proposal from passing.

AWT: "The board will need to specify what source would be used to define the limits of the listed trails covered in this proposal. The maps linked in the proposal come from several sources and were created at various times over the past number of years. The board would need to define which maps would be valid and specify if a trail map was updated in the future with new trails, if that new trail would automatically fall under this regulation or not." We recommend the same process that specifies trails in Juneau and Kachemak Bay State Park setbacks here. AWA is happy to support this process. Given the popularity of these trails, maps of the trails are maintained by local or state agencies and should be readily available. Regarding new trails, this would apply to the ski areas listed in the proposal where new trails may be created (for example, the Government Peak Recreation Area, which is a non-motorized trail system maintained by the Mat Su ski club). Our recommendation would be to establish the buffer along named, maintained trails within the approved area (ex: Government Peak Recreation Area) as identified by the maintaining organization (ex: Mat Su Ski Club).

AWT: "Some trails vary over time due to various natural events such as erosion, landslides, and even snow cover. The location of the Gold Mint Trail in Hatchers Pass in summer is not the exact location that the snowmachine and ski traveled Gold Mint Trail exists in the winter." Similar to how these regulations are codified in other parts of the state, the buffer is set around a determined area delineating "the trail", which is fixed. If the trail deviates from the mapped version (as winter trails sometimes do), it is the responsibility of the recreationalist to ensure they're still in a protected space. The goal of this proposal is to establish safety corridors for non-trappers. Even if the buffer ends up shorter on one side or another due to seasonal differences, the 100 yard space (50 yards each side of the trail) should still provide reasonable coverage. Again, these setbacks are not novel in Alaska - the Department would codify them and AWT would regulate them the same as they do in GMU 1 and 15C.

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"The definition of "enclosed" would need to be established for purposes of this regulation as currently the term is not defined in 5AAC92." We agree, and propose the definition agreed upon during the negotiation in 2022 (led by BOG member Keogh). There, we agreed to "enclosed" meaning enclosed with only an opening of 3" max (RC014, 2022 Statewide Meeting). Essentially, we were trying to find language that described weasel boxes. In Wisconsin, "Enclosed Trigger Trap" is defined as *"any trap with a push- or pull-activated trigger located inside an enclosure and recessed 1¼ inches or more from an opening that is no greater than 1¾ inches in diameter. The diameter of the opening is measured as the straight-line distance across the opening between the two inside points that are farthest apart. If the opening is square or rectangular, this measurement must be made from the two opposite corners that are furthest apart."* We suggest taking this language and adjusting to 3 inches in diameter. We also defer to ATA and other trappers to help define what an appropriate opening size would be to make small game trapping possible without a wide enough opening for dogs.

Proposal 83 and 84: Extend the spring hunting season for ptarmigan in Unit 16 (83) or 14A and 14B (84)- **OPPOSE**

- The current hunting season length for ptarmigan has been in place in Units 14A and 14B since 1990 (34 years).
- This proposal would likely reduce breeding densities around areas accessible from the road and trail systems.
- By mid-April ptarmigan are already establishing and defending breeding territories, late season harvest mortality is likely additive (i.e., adds additional mortality beyond what is expected naturally) and would likely lead to reduced spring breeding densities.
- Increasing the amount of late-season harvest, may result in localized depletion, and particularly at accessible sites near roads.

PC9

Name: Austin Chappelle, Alaskan Wildlife Alliance

Community of Residence: Mount Vernon

Comment:

I am in support of proposal 11, 28, 29, 30, 31, 35, 36, 61, 63, 80, and 82 because I believe that these proposals will be in the best interest of Alaskan wildlife. And I am in opposition of proposal 2, 3, 32, 33, 34, 57, 58, 59, 60, 70, 71, 72, 75, 76, 77, and 79 because I feel that the impacts of these proposals would be detrimental to Alaskan wolves, black bears and large hoofstock.

PC10

Name: Karen Pletnikoff, Aleutian Pribilof Islands Association

Community of Residence: Anchorage

Comment:

Please see attached that APIA opposes Proposal 23 due to the inappropriate timing to expand the sport hunt while subsistence hunting is closed, expansion contradicts the current management plan, and there is no harvestable surplus to allocate for sport expansion while subsistence needs, including egging, are not being met.

PC11

Name: Jerome Alicki

Community of Residence: West Olive, Michigan

Comment:

To whom it may concern:

As a citizen of the United States and a frequent tourist and visitor to the state of Alaska I stand vehemently opposed to Proposals 59, 75 and 79. I firmly believe that trapping of wolves to limit their populations is a barbaric outdated practice which should be banned in all 50 states. Aerial shooting of wolves and bears is also an unnecessary, disgusting, repulsive practice which should be stopped entirely. It serves no purpose. We live in a time when species are going extinct daily, if not hourly. Killing these animals is not only reprehensible, I believe it is a crime that future generations will curse us for doing. Stop killing the wolves.

Thank you,

Jerome Alicki

PC12

Name: Patricia Alonso

Community of Residence: Fairbanks, Alaska

Comment:

Ref: Proposal 78: OPPOSE

Allow the same day airborne take of wolves in the active, Unit 16 Intensive Management Plan

Proposal 75: OPPOSE

Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan

Ref:Proposal 33: OPPOSE

Allow the same day airborne take of brown bear and wolves in Unit 17

Proposal 59: OPPOSE

Lengthen the wolf trapping season in Unit 11.....

OPPOSE ALL OF THE ABOVE: Proposal 33, 59,75, 78

I oppose the Predator Control Proposal to utilize aerial gunning to kill wolves, a keystone species to our ecosystems, via aerial gunning 'to help restore moose populations. It is extremely disappointing that the state would even consider state employees to kill a large amount of wolves every year by shooting them down using aircraft for this reason, when the reality is that human 'predators' will end up hunting these moose themselves. This does not make any sense, especially when one of the rationales stated in the proposal states animal aggression as a reason for shooting wolves, when moose themselves are known to be aggressive. Wolves were nearly wiped out entirely in this country, and great efforts are still being made to bring them back. However, some humans who either have no respect for wildlife, are cowardice, ignorant, or greedy predators themselves would rather wipe them out entirely to profit for themselves. Wolves have been and continue to be persecuted, just for being wolves. These animals have every right to be here as any human being or any other animal, and the science has proven that these animals play a vital role on our planet, and research findings have concluded that killing wolves and bears did not lead to better moose hunting.

PC13

Name: Jenny Alvarado

Community of Residence: USA

Comment:

I firmly oppose Proposals 75, 76, 77. Brown bears bring money via tourism and are an important part of the majesty of Alaska and the last untamed wild in our country. Allowing their killing by helicopter (along with wolves) is cruel and unnecessary. They should be protected and respected for all they contribute to wonder of Alaska.

PC14

Name: Tony Alvarado

Community of Residence: Usa

Comment:

proposition 75 Shooting bears by helicopter is just wrong! Bears are a large part of what makes Alaska great

propositions 76/77 - the bear hunting season is enough how it is

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PC15

Name: Joshua Anderson

Community of Residence: Wasilla

Comment:

Proposal 3. As an avid spring bear baiter and cabin owner in unit 16b. The use of cellular trail cameras should be legal! I run baits that are 20-35 miles by boat. It becomes costly just to check baits to see if they are active. In units where ADFG has already raised limits on bear harvest and moose numbers are low, it makes most sense to allow a simple tool to help manage these predators.

PC16

Name: Antonella Angilella

Community of Residence: Parma, Italy

Comment:

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its

ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

According to the Arctic Report Card, the number of caribou that roam the Arctic tundra grazing on lichen and other cold-hardy plants has declined by 65 percent over the past few decades. Natural "boom and bust" cycles may initially have played a role in these declines, but the herds' failure to recover is likely driven by human influences, including impacts from global warming, mining, roads, and other development.

Large predators play a central role in the ecological balance, which has a positive effect on nature: for example, wolves hunt mostly weak and sick animals, thus strengthening the entire prey population. Prey adapt their behavior to the presence of other predators, which benefits the forest. Bears scavenge the carcasses left by other predators, thus helping to prevent the spread of diseases. The ecological role of predators is significant, as they help maintain biodiversity by preventing a single species from becoming dominant.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly,

so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature’s balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

Antonella Angilella

PC17

Name: Eric Anslinger

Community of Residence: Fairbanks

Comment:

I fully support cellular cameras for bear baiting (would like to see it statewide). So called "community" harvest have destroyed the moose population in all of unit 13.

PC18

Name: Pamela Aramburu

Community of Residence: Mexico

Comment:

Proposal 75 - Aerial Gunning Outside of Denali: OPPOSE.

It's unethical and inhumane. Studies have shown that Alaska's predator control programs — aimed at boosting moose, caribou, and deer populations for hunters — do not increase human moose harvest.

Large carnivore management in Alaska is a reversion to outdated management concepts and occurs without effective monitoring programs designed to scientifically evaluate impacts on predator populations or identify causal relationships between predator control and pre-population dynamics. We can't find better solutions together.

Proposal 82 - Palmer Trapping Setbacks: SUPPORT

Trapping setbacks are popular, easy to put in place, and seem to work; they have been successful in Unit 1C in Juneau and in the Anchorage municipality.

The setback distance is small enough to not significantly reduce the BOG's ability to manage wildlife.

Trapping setbacks on these popular trails would help reduce incidental trap encounters with recreationists and their dogs.

Proposal 11 - Shortened Brown Bear Seasons Near Katmai: SUPPORT

With the early season hunt, operators were still dropping off sport fishermen and wildlife viewers on rivers where bear hunting was taking place. Hunting camps and hunters were occupying critical habitats where bears were fishing, forcing other users to avoid these areas.

Bears were shot right at the outlet of the Kulik River. The Kulik Lodge had employees breaking down camp, there were several groups of sport fishermen on the river as well as wildlife viewers. A bear had cached a hunter-shot carcass right at the outlet of the Kulik River where aircraft picked up sport fishermen and other visitors.

This proposal would restore the hunting season to the pre-2022 length and would reduce human-wildlife conflicts.

Proposal 29 - Mulchatna Caribou Herd Population Review: SUPPORT

The Mulchatna caribou herd has changed continuously from the time monitoring began. The current population objective (30,000-80,000) was established in 2008 at which point the population was estimated to be 30,000. This objective has been achieved only once since then.

Habitat quality has likely changed since the last population objective was established, and a new review should take this into consideration as it has almost certainly reduced population potential.

A review of the population and harvest objective for the MCH would provide valuable data to inform game management and the Mulchatna Predator Control Program.

Proposal 2: OPPOSE: air populations are already declining globally due to loss of biodiversity city due to climate change.We do not need more killings. This would open two bear baiting seasons in Units 9, 11,

13, 14B, 14C, 16, and 17, broadly expanding bear baiting. The ADFG is already killing bears under IM in Units 17, 18, and 19. There is also potential for user conflicts and more human and bear interaction in Units 13 and 14.

Proposal 3: OPPOSE: this would make killings easier , which would contribute to the decline of biodiversity. It's inhumane , we should be promoting their conservation.

This would allow the use of cellular cameras for taking bears over bait in Units 9, 11, 13, 14B, 16, and 17. Bear baiters would be allowed to use game cameras that communicate wirelessly to locate, identify, and monitor activity at bait stations. If adopted, it would likely pursued statewide.

PC19

Name: Elizabeth Arendt-Delgado

Community of Residence: Grand junction

Comment:

** Please see PCXXX for complete comments.

PC20

Name: Ursula Arno

Community of Residence: Palmer

Comment:

I support proposal 82 to help keep dogs out of traps on trails in Hatcher Pass and the valley.

PC21

Name: Laura Atwood

Community of Residence: Anchorage

Comment:

I am opposed to Proposal 75 because studies show that Alaska's predator control programs do increase human harvest of moose; Alaska does not have monitor their predator control programs effectively with scientific studies designed to evaluate the impacts on predator populations or identify causal relationships between predator control and pre-population dynamics; and I am opposed to ADF&G having the ability to develop an Operational Plan for aerial gunning that is not open to public comment.

I support Proposal 82 because of the danger of non-targeted animals, including domestic pets, being caught in traps and because trapping setbacks have been effective in the Municipality of Anchorage.

I support Proposal 11 because it will reduce human-wildlife conflict and because hunting bears who are habituated to human presence goes against the ethics of fair chase. I would prefer that bears in this area, who are used to humans, are not hunted at all.

I support Proposal 29 because there is no evidence the predation was a primary cause of decline in the herd and even with predator control, the herd has continued decline. Therefore, a review to determine population might offer valuable evidence to indicate the source(s) of decline and inform management decisions

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PC22

Name: Emily Atwood

Community of Residence: Eagle River, Alaska

Comment:

Proposal 75 - Aerial Gunning Outside of Denali: OPPOSE. Studies have shown that Alaska's predator control programs — aimed at boosting moose, caribou, and deer populations for hunters — do not increase human moose harvest.

Large carnivore management in Alaska is a reversion to outdated management concepts and occurs without effective monitoring programs designed to scientifically evaluate impacts on predator populations or identify causal relationships between predator control and pre-population dynamics

Proposal 82 - Palmer Trapping Setbacks: SUPPORT. Trapping setbacks are popular, easy to put in place, and seem to work; they have been successful in Unit 1C in Juneau and in the Anchorage municipality.

The setback distance is small enough to not significantly reduce the BOG's ability to manage wildlife.

Trapping setbacks on these popular trails would help reduce incidental trap encounters with recreationists and their dogs.

Proposal 11 - Shortened Brown Bear Seasons Near Katmai: SUPPORT. With the early season hunt, operators were still dropping off sport fishermen and wildlife viewers on rivers where bear hunting was taking place. Hunting camps and hunters were occupying critical habitats where bears were fishing, forcing other users to avoid these areas.

Bears were shot right at the outlet of the Kulik River. The Kulik Lodge had employees breaking down camp, there were several groups of sport fishermen on the river as well as wildlife viewers. A bear had cached a hunter-shot carcass right at the outlet of the Kulik River where aircraft picked up sport fishermen and other visitors.

Proposal 29 - Mulchatna Caribou Herd Population Review: SUPPORT. The Mulchatna caribou herd has changed continuously from the time monitoring began. The current population objective (30,000-80,000) was established in 2008 at which point the population was estimated to be 30,000. This objective has been achieved only once since then.

Habitat quality has likely changed since the last population objective was established, and a new review should take this into consideration as it has almost certainly reduced population potential.

A review of the population and harvest objective for the MCH would provide valuable data to inform game management and the Mulchatna Predator Control Program.

PC23

Name: Jill Auxer

Community of Residence: Grove City, Ohio

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: ___JILL AUXER_____ DATE:_____26 DECEMBER 2024_____

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting

could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

PLEASE SPEAK UP FOR THOSE WHO CANNOT SPEAK FOR THRMSELVES

JJILL AUXER

[redacted]

GROVE CITY, OHIO 43123

[redacted]

PC24

Name: Tony Ayala

Community of Residence: California

Comment:

Prop 57

These sacred animals have been here roaming Mother Earth for thousands of years. It is not up to us to exterminate them for the Great Rock has always cleansed herself when needed. Let them live and let the creator take them naturally after their many battles of survival

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PC25

Name: David Bachrach

Community of Residence: Homer, AK

Comment:

Board of Game

Alaska Department of Fish and Game

PO Box 25526

Juneau, AK 99802-5526

Re: Proposals 11 and 18

Dear Members of the Board:

I would like the Board Members to SUPPORT Proposals 11 and 18.

This is not a new issue for the Katmai Preserve. Some of these same concerns were ones raised in 2009, and at that time the BOG agreed to change the start date of the hunt season from October 1, to October 7.

As a wildlife viewing guide for over 20 years, almost exclusively in Katmai National Park and Preserve (KNPP) areas. I can tell you from my observations on the ground and from other guides that I know we are seeing a steep decline in the number of large, mature male bears observed in the 12 to 25 year old range. Even ADF&G's own data for GMU 9C shows that most of the bears harvested are under the age of 10 and have been for some time. While some people may want to argue that there's plenty of bears out there. One indicator that something may be wrong is the absence of large mature male bears, either being seen by wildlife viewers and photographers or being harvested by sport hunters.

From a hunting perspective, this is supposed to be for trophy brown bears. In my opinion, eight and nine-year-old brown bears are not what I would consider to be trophy sized worthy of the $35,000. plus price

tag for these hunts. From a wildlife viewing and photography perspective having all ages and sex is well represented is what we consider a high-quality experience.

From an Alaska visitor experience viewpoint, having hunting going on while people are engaged in sport fishing, camping, wildlife viewing, photography and rafting is incompatible with big game hunting in this relatively small Katmai Preserve area. Moving the start date back to October 7, will alleviate most of the user group conflicts. Which is good for everyone involved.

I also would recommend that the BOG in conjunction with its 2023-227-BOG BOARD OF GAME BEAR CONSERVATION, HARVEST, AND MANAGEMENT POLICY request that ADF&G and its KNPP counterparts develop a comprehensive brown management plan to help make decisions for brown bear hunting in the Katmai Preserve. The management plan should clearly specify population goals, harvest goals, and equivalent goals for viewing and photography opportunities, as well as the data from Capture-Mark-Resight techniques (including DNA), harvest data, local observations and knowledge that were used to support the management decisions.

As someone from the Kenai Peninsula, who has seen first-hand the rapid decline of King Salmon and halibut in our fisheries. I would hope that we could be smarter about how we manage our brown bear population on the Alaska Peninsula.

Thank you for considering my comments.

BACKCOUNTRY
HUNTERS & ANGLERS
ALASKA

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

December 27, 2024

Re: Board of Game Proposals: 19, 20

To the Alaska Board of Game,

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

Proposals 19 and 20: AK BHA **SUPPORTS** proposals 19 and 20, which strive to set nonresident hunter and trapper bag limits for an endemic subspecies of Arctic fox that is lumped in with introduced red fox populations throughout GMU 10 and currently has no closed season or bag limit. The data that Dr. White has provided indicate that the population of Arctic foxes is vulnerable to overharvest and other pressures, and because the foxes on the island are considered a unique, endemic subspecies they should be conserved more carefully. Adding these reasonable bag limits for nonresidents will ensure that overharvest doesn't occur, and will not affect the ability of locals (or Alaskans in general) to hunt or trap Pribilof Island Arctic foxes. We are encouraged that Dr. White has secured the support of a local community organization, showing that she has consulted with locals and is trusted by them due to her long tenure on the Pribilof Islands researching these foxes. Alaska BHA supports the use of sound science in wildlife management decisions, the conservation of the unique game animals of our wonderful state, and the ability of local communities to guide the management of their resources. Therefore, these proposals fit BHA values and we request that the Board of Game please implement them as they are written.

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,

Mary Glaves

Mary Glaves
Alaska Chapter Coordinator
(607) 349-1831
glaves@backcountryhunters.org

PC27

Name: Johanna Bakker

Community of Residence: Auke Bay, AK

Comment:

Proposal 82.

I support proposal 82

This was a negotiated outcome. Originally submitted in 2022, the BOG deferred the proposal until a stakeholder meeting between trappers and non-trappers could be held to discuss the setback proposal. The meeting adjourned with consensus on the setback locations and conditions listed in the proposal.

Proposals 30 and 31.

I support proposal 30 and 31

Proposal 32,33, 34.

I oppose proposals 32, 33,34.

Proposals 35 and 36.

I support proposals 35 and 36.

Proposals 57, 58, 59, and 60.

I oppose proposal 57, 58, 59 and 60.

Proposal 70.

I oppose proposal 70

Proposal 71.

I oppose proposal 71. I oppose the 30 day extension of brown bear hunting season.

Proposals 72, 76 and 77.

I oppose proposals 71, 76 and 77.

PC28

Name: Nancy Bale

Community of Residence: Anchorage, Alaska

Comment:

I am concerned about efforts to deploy widespread aerial gunning of predators in Unit 16. I ask that you not approve Proposal 75, which authorizes the use of ADFG department personnel for aerial gunning. Based on the Department overview at RC 4, Tab 6.1, the moose are doing well in Unit 16, population objectives are being met or exceeded, bull: cow ratios are being met, and harvest objectives are being met in 16B (see slide 6 in this report). This does not look like an area that needs an enhancement of predator control. Instead, you should discuss the possibility of suspending IM in Unit 16.

As a long-term Alaska resident and many-year resident of the bush, I understand the importance of hunting. However, I also know that Alaska citizens do not like or appreciate aerial gunning of wolves and bears, and have said so with comments to you, and in initiatives. Somehow, through time, aerial gunning has returned to the scene, but it would not be consistent with the wishes of Alaskans to authorize an expansion of this practice in Unit 16, absent any sort of compelling need.

Pre-authorizing the potential for the Department to conduct this removal is inappropriate in Unit 16, where benchmarks are almost being met.

Reading your materials, I see deficiencies in the data on actual predator numbers in Unit 16. Again, on RC 4, Tab 6.1, the current numbers are estimates. From your graphs in this RC, populations of bears and wolves actually appear to be down, after many years of predator control in this Unit. Yet the department plans to reduce these numbers further. This action reflects a bias in favor of IM rather than science-based monitoring and management. Please do not pass Proposal 75 and instead consider suspending predator control in Unit 16 while updating your numbers.

I urge you not to pass Proposal 3, which authorizes remote camera use on bait stations. This proposal could lead to a proliferation of unmanned bait stations, is not consistent with fair chase, and would eventually lead to the opening of the hunting space to expanded use of wireless devices for finding game. The Department, though neutral on this proposal, states that if it is adopted the Board should apply it to the entire state for consistency. I disagree with this proposal in the first place, but oppose any expansion of identified Units without first inviting public comment for a Statewide Regulations meeting.

Please pass Proposal 29, which was brought forth by a wildlife scientist and would instruct the Department to further investigate the basis for its IM population objective of 30,000 to 80,000 caribou in the Mulchatna herd (with a harvest objective of 2400 – 8000 caribou). The proposer questions the validity of these population objectives and suggests further monitoring of habitat, to come up with a more scientifically-based number, based on true carrying capacity. I believe that without further monitoring of all the influences, the existing goals are questionable and the predator control efforts designed to promote these goals may be unwarranted or could be reduced. This proposal suggests good science, something the Department claims it supports.

I try to attend Board of Game meetings whenever I can, and I do enjoy the presentations and having the opportunity to meet other interested parties from around the state. I encourage you, the members of the Board of Game, to take very seriously your duty not to rubber stamp ADFG department proposals by accepting assumptions not backed by solid science. In so many of the meetings I attend, the votes are unanimous with little significant discussion. I would like to see some dissent and critical thinking about

what the Department is asking you to approve. A Board such as yours should have diverse opinions, critical opinions, and lively discussion. I hope this happens.



Name: Adam Banuelos

Community of Residence: Hamilton

Comment:

Opposed to 74



Name: isabel bareno

Community of Residence: California

Comment:

Prop 76 is disgusting and would mess up the food chain. Don't kill predators :(



Name: Whitney Barkley

Community of Residence: Minnesota - With family in Seward and Anchorage

Comment:

***Please see PCXXX for complete comments.



Name: Lance Bassett

Community of Residence: Homer, AK

Comment:

I strongly oppose Proposition 75. This proposal lacks merit in justifying the culling of wolves and bears from aircraft or on the ground to increase the populations of other animals, primarily moose, caribou, and deer in Unit 16. There is little to no scientific data to support such blatant slaughter of these predators in an already fragile ecosystem, where predators keep animal populations in check by preying on the sick and old, thereby maintaining equilibrium and a rich, diverse ecosystem. Alaska has a history of this type of aggressive stance on game management; however, it has never resulted in the desired outcome and, in fact, destabilizes the very ecosystem they are supposed to protect.

I firmly endorse Proposition 18. Reverting the hunting season to its former duration and instituting a one bag limit every four years through a drawing permit system will help conserve and restore the brown bear population, which has experienced a decline in recent years due to overhunting. This will help reestablish the population for both hunters and bear viewing alike.

I am in support of proposal #82 to the Alaska Department of Fish and Game trapping regulations. In support of this, let me start at the beginning of where I became aware of the need for change to the regulations. Our 18-month-old Brittany puppy was killed 3 days after Thanksgiving 2024 in a snare on the trail system 1/2 mile from the Jim Creek recreational campground on Sullivan Avenue. The snare was setback less than 15 yards from the main trail. This trail is commonly used by hikers, bicyclist and families with children and dogs. The current Alaska trapping regulations General Information on page 6 states:

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

Trapping in this area is not acting responsibly as a trapper. It is a high recreational use area with a frequently used trail system and near homes within 1 mile. The regulations further have a Trapper Harassment Law on page 11.

Summarized: ***It is against the law to intentionally obstruct or hinder another person's lawful hunting fishing trapping. Illegal activities include tampering with traps. It is illegal to create a sight, sound, or smell to alter the behavior of game that another person is attempting to take. It is enforceable by up to a $500 fine and or 30 days in jail. Alaska Statute (16.05.790)***

This Statute holds persons accountable to their actions with enforceable punitive action that the State of Alaska takes against a person who tampers with a trap. This regulation favors trappers, there is no

accountability for the trapper to act responsibly. There are no enforcement actions that can be taken against a person (the trapper) not acting in a responsible manner. There is only a recommendation to act responsibly within the regulations. This lack of an enforceable regulation is an unfair practice and favors trappers giving them the freedom to do what they determine is responsible.

Enforceable Regulations should be adopted to include:

- Require a trapper education course/clinic to obtain a trapping license. (same as is required for youth hunters and bear baiting regulations).
- Require signage be placed near active traps. (same as Bear baiting regulations).
- Require that all traps be marked with an identifying number that is issued by the Department of Fish & Game to a specific trapper's license.
- Hold the person who engages in a trapping activity and does not adhere to the standards set forth in the trapping regulations, accountable to Alaska Statue (16.05.790) for their actions and the violation of trapping regulations.

The current proposal to the trapping regulations establishes 50-yard setback from a trail that a trap or snare may be set. The trails that are included in in the proposal are minimal and do not cover all statewide public trail systems. I am in favor of this proposal; however, I feel that it should be expanded to include all public trail systems statewide and any other established manmade trail. This especially should be specific to the Matanuska Susitna Valley, Anchorage, Fairbanks, Wasilla, Palmer, Kenai, Soldotna, Homer, Seward within a radius (to be determined by the board) from highly populated areas. To allow for encompassing

frequently used trail systems (propose 10 miles). Additionally, the proposal setback for a trap to be placed should be increased from 50-yards (propose 100-yards). The increase to 100-yards is justifiable because of hunters utilizing upland bird dogs to hunt birds (grouse and ptarmigan) and other scent dogs used for rabbit hunting. Both of which hunt farther than the proposed 50-yards. Bear baiting stations are required to be more than ¼ mile from a public trail and more than 1 mile from a house, school, business, recreational facility, campground, or permanent dwelling. Trapping setbacks should similarly align with these regulations.

There are areas statewide with more stringent trapping and snaring ordinances.

- Unit 1C - Juneau area designated trails have a ¼ mile trap setback.
- Unit 15C - Homer area specific trails have a 100-yard trap setback.
- Anchorage Municipality - designated trails have a 50-yard trap setback.
- Matanuska-Susitna Borough - Prohibits trapping on public school property and the Crevasse-Moraine trail system.

The Alaska Department of Fish and Game needs to take the initiative to follow suit of the ordinances, codes and statutes put in place by some municipalities and boroughs. The regulations need to be updated to align with the growing population of the state and populated areas by considering all recreationalist and not just a single special interest group; to completely prohibit trapping near highly populated areas.

To protect others is why we put in place new laws, regulations, statutes, codes, and ordinances. Imagine if laws and regulations in the aviation industry would not have changed since the 1950s. Good and well

thought out regulations have made the aviation industry safer, thus protecting and preventing the loss of life and property. The same should be done for the people of the State of Alaska with public trail system usage.

The small population of trappers compared to other users of a public recreational area does not justify the continuation of this trapping practice near highly populated areas and public trailheads. I understand that all persons have the right for recreation in many forms. However, as times change and population increases, the need to amend the rules and regulations becomes necessary to protect the rights of all person's life and property.

I believe that trappers in general are responsible and ethical and practice their craft as such. I feel that the ones who have set their traps in public recreational areas and trail systems used frequently by others, are unaware of the regulations. I feel that a younger generation is responsible for using these areas. These youth have no mentors to teach them the methods and the responsible ways to ethically trap. They are recreational trappers (perhaps in some cases, without a trapping license or understanding the regulations). They are not professional, responsible, and ethical trappers. A trapping education course, with a written, oral, and practical test should be implemented and must be completed prior to obtaining a trapping license. This is a requirement for youth hunters and an ADF&G approved bear baiting clinic is required for baiting bears. A similar education course should be a requirement for a trapping license and especially a youth trapper. It seems easy to go to a trapping supply store and purchase a trap and equipment, then watch a You-Tube video for setting traps. Perhaps a system could be put into place where an experienced trapper could mentor a young trapper under the experienced trappers license. This is where an education and mentorship program would decrease the

amount of conflict between trappers and other groups who use the State of Alaska Public Trail System.

Thank you for your time and consideration.

Respectfully,

Robert J. Beck

PC34

Name: Brian Beckwith

Community of Residence: Eagle River, AK

Comment:

I SUPPORT Proposal 11. It make sense to have diminished opportunity for conflict and reduced shooting going on while a greater number of people are present.

I SUPPORT Proposal 29. The data doesn't support predation as a cause of the Mulchatna herd decline. It's foolish to undertake a 'solution' that has no bearing on why it's happening. This proposal deserves support.

I SUPPORT Proposal 82. Setbacks are not a huge inconvenience for trappers, and provide increased safety for children and pets near trails. It's pretty much a no-brainer for anyone concerned about safety for people and less trouble for trappers.

I OPPOSE Proposal 75. Removal of predators is not needed. Near Denali, they are more valuable for possible viewing by tourists, and needed for a healthy, diverse animal population. Also, aerial killing of animals is ethically unacceptable. I know Alaska doesn't seem to care about fair chase principles, but I and many other ethical hunters do.

PC35

Name: Kylie Bennett

Community of Residence: California

Comment:

I oppose Proposal 25

PC36

Name: Robert Bennett

Community of Residence: Seattle

Comment:

Proposal 33: Allow same day airborne take of brown bear and wolves Unit 17

I oppose this change and feel it is inhumane to bears and wolves.

PC37

Name: Rebekah Benz

Community of Residence: South Dakota

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: _____Rebekah Benz_____ DATE:_____December 26 2024_____

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

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Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

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Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

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Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

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Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature’s balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

NAME: Rebekah Benz

ADDRESS: [redacted] Brookings South Dakota 57006

PC38

Name: Paula Biever

Community of Residence: St Paul, Minnesota

Comment:

I am writing in support of the three proposals:

1.) Proposal 82 - Palmer Trapping Setbacks, which helps separate trapping activities from hikers and their dogs by keeping traps further away from pathways. This makes great sense to me as a public safety action that would not detrimental to trapping, as wildlife would tend to stay away from the noise and activity of hikers. Let's keep the traps away from the hikers too!

2.) Proposal 11 - Shortened Brown Bear Seasons Near Katmai, which prevents overlap of bear hunter traffic with traffic from photographers, bear-viewing tourists, people who are fishing, and people

conducting scientific research in the area. The season was extended in 2022 and this proposal would set it back to what it previously was. The potential for conflict over use of camping areas and pathways, plus the public safety issues makes this a good move.

3.) Proposal 29 - Mulchatna Caribou Herd Population Review. This is a much-needed effort to determine what the issues actually are that have caused population decrease in this caribou herd. Making assumptions and taking action on those assumptions can be a wasted effort if those assumptions are not true. Learning more about this problem can help wildlife management make effective decisions, decisions that would be much better regarded than just trying something without a rigorous plan to verify that it works. Killing bears with an aerial assault should not be done lightly, this is an action that sits very negatively with tourists and photographers who look forward to seeing returning bears, and who spend quite a bit to get access to those bears.

This brings me to a proposal that I do not support:

4.) Proposal 75 - Aerial Gunning Outside of Denali

This proposal is premature, since it the effect of previous aerial gunning is unknown. Perhaps this option is thought to be something that is easy to do and may have a benefit on maintaining the caribou herd, but it has consequences that should not be overlooked for the sake of expediency. It promotes a culture of action for action's sake and not because it has been shown to work. Frankly, it also bad PR for the tourist industry that the Alaska area relies on and gives the appearance of not caring about wildlife except in terms of hunting, specifically hunting caribou. Tourism brings in a lot of money and also creates a positive image of Alaska in the minds of people who visit. My position is that Proposal 75 should only be considered after the results of Proposal 29 has evaluated whether this is effective action.

PC39

Name: Mark Binggeli,, N/a

Community of Residence: Knik Goose Bay

Comment:

I am Writing in support of proposal #3 to allow for use of cellular cameras when baiting bears. There are numerous reasons to allow for cellular cameras including: safety, more accurate age class and sex identification, reduction of traffic to sites and improvement of over all hunting experiences. Many GMUs areas listed where bears are baited and hunted in this proposal are very difficult to access. Use of cellular cameras would assist in better hunt planning and overall enjoyment. Use of cellular cameras may also get more and younger hunters interested in spending time outdoors. I do not feel there is any loss of sportsmanship or ethics by allowing their use. Contrary to assumptions, successfully hunting bears over bait involves a significant about of time, effort, and luck. Cellular camera use will increase enjoyment, knowledge, and the overall experience. Approval of proposal #3 after all just allows an optional technique to a challenging hunting experience.

PC40

PC 40 intentionally left blank.

PC41

Name: catherine blackburn

Community of Residence: Montrose, MN

Comment:

Proposal 58 for unit 13 - Stop killing wolves! stop shooting and stop trapping them; just go away and leave nature alone.

PC42

Name: Jacqueline Bock

Community of Residence: Sterling

Comment:

I oppose Proposal 75. I oppose opening a predator control program in Unit 16, allowing ADFG to kill wolves, brown bears, and black bears using any aircraft, including helicopters.

I support Proposal 82 which would establish a 50-yard trapping setbacks along specific trails in the Mat-Su region.

I support Proposal 11 and endorse shortening the spring and fall brown bear seasons by one week in Unit 9C, near Katmai and McNeil Wildlife reducing user conflicts in the area. As written by Jennifer Culbertson, "Shorten the brown bear season dates in Unit 9C by 12

days from October 1–October 21 and May 10–May 31 to October 7–October 21 and May 10–May 25 for both residents and nonresidents."

I support Proposal 29 and call for a review of the population and harvest objectives for the Mulchatna caribou herd. Minimum numbers are not being met, and the herd has declined far below lower population objectives. This review could abate the predator control program in the area, which, in the two years that it has run, has killed over 200 bears. Additionally, I support completely closing the Mulchatna herd so that it has a chance to repopulate and be free of over hunting and poaching.

PC43

Name: Laura BONNEFOND

Community of Residence: Chizé

Comment:

To whom it may concern,

I am writing in support of Proposal 19 & 20, which aims at regulating arctic foxes' hunting & trapping at Pribilof Islands. I am a PhD student working on arctic foxes' movement ecology in France, and have already witnessed their decline in several areas and their struggle to survive.

Similarly, the Pribilof Islands population currently has to face many challenges including climate change, habitat degradation, and loss of their main preys. The fact that there is currently no limit to the number of foxes that could be hunt could highly impact their numbers. Because the genetic diversity in this population is already quite low, reducing the number of individuals (and thus, the genetic diversity of the population) could negatively impact their survival by making them even less adaptable to changes. Furthermore, shooting individual foxes could strongly impact the rest of the population by disrupting their social structure. Indeed, arctic foxes live in pair and generally stay together for their entire life. As such, shooting one member of a pair could result in 1/ no breeding for the second fox of the pair for this season at least and 2/ the probable dispersal of the remaining fox, with all the risks associated (dispersing foxes have very low survival rates).

Serious conservation efforts have already proven to strongly benefit arctic foxes' populations (e.g. in Norway). As a top predator in the area, arctic foxes are keystone species in the ecosystem. They provide important ecosystem services such as removing carcasses or fertilising the soil with their faeces. Losing this key species would result in cascading effects on the ecosystem, and all the species that inhabit it.

Please, consider restricting arctic foxes hunting & trapping in Pribilof Islands.

Best regards

PC44

Name: Debbie Booth

Community of Residence: California

Comment:

As a botanist and wildlife enthusiast I strongly oppose prop 7 predator control program targeting brown bears and wolves. These programs are a waste of taxpayer money and do not serve the intended purpose of boosting Moose populations and other species. Instead, they harm the ecosystem by killing off large predators. I strongly oppose prop 7.

PC45

Name: Sharon Bou Chdid

Community of Residence: Winnipeg Canada

Comment:

Proposal 72 and 75! I oppose !

Michelle Breinholt
Willow, AK

My Comments on why I support or oppose a specific propositions released by the Alaska Board of Games.

First let me start by saying that since moving to Alaska five years ago, I have been overwhelmed by the enormity of this state, its beauty and its wilderness. At the same time I have been sadden to see the wanton disregard for wildlife and wild places by many Alaskans who really should know better. I want to scream “open your eyes and see what has happened in other places!” Do you really think this place was created just for you??? Apparently they do. I have also been shocked by the omnipotent actions of the ABG. That one state entity should have so much power over what happens to wild creatures who are just trying to live their lives is pathetic and sad. And I come from Utah! Now, before you go all “life long Alaskan” (a phrase I have come to hate) and “way of life” on me, let me turn that back on you and say don’t bother I have heard it all already and as a retired educator I can only point to the fact that the science is on my side and you will regret your horrible decisions soon enough.

It won’t come as a shock that I do not support any proposal that has humans at a big advantage over wild animals with their technology and high powered weapons. I also do not support any methods that have animals being trapped as I feel it is the cruelest way to die. Here is my list provided to me by the Alaska Wildlife Alliance who I do support.

Prop 75	OPPOSE	because it is disgusting and cowardice.
Prop 82	SUPPORT	because I hate seeing people’s pets get hurt
Prop 11	SUPPORT	because other people besides hunters deserve to

have an Alaskan wildlife experience before all the bears are gone.

Prop 29	SUPPORT	because SCIENCE! Read the science!

For myself:

Props 2, 3	OPPOSE
Props 10,12	OPPOSE
Props 23, 24	OPPOSE
Props 28, 29	SUPPORT
Props 32, 33, 34	OPPOSE
Prop 39	SUPPORT
Props 57, 58, 59, 60	OPPOSE

Michelle Breinholt
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Props 10,12	OPPOSE
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Props 32, 33, 34	OPPOSE
Prop 39	SUPPORT
Props 57, 58, 59, 60	OPPOSE

PC47

Name: Anna Brewer

Community of Residence: Albuquerque

Comment:

I'm AGAINST Proposal 75 - Aerial Gunning Outside of Denali:

Alaska's predator control / killing programs for hunters, to shoot more caribou and deer do not increase their killing harvest.

It's an outdated concept of wolves versus 2 legged killers where wolves do belong in nature to prevent more sick wildlife, and hunters don't belong in their surroundings.

-----Supporting Proposal 82 - Palmer Trapping Setbacks: to prevent more deadly accidents, trapping pets etc.

-- Supporting Proposal 11 - Shortened Brown Bear Seasons Near Katmai, shorten the killing of these majestic animals with 1 week

---Supporting Proposal 29 - Mulchatna Caribou Herd Population Review

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PC48

Name: Carman Bryant

Community of Residence: Missouri

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Carman Bryant DATE: 12/24/24

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could substantially reduce their population and limit the DNA diversity in the species. Alaska's economy is better served in protecting bears. Annual influx of visitors hoping to see wildlife generates millions of dollars in revenue and numerous jobs for Alaskan residents.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. Bear - human interactions are far more unpredictable if a bear has learned to associate people with a food source. If hunting is the ultimate goal, the hunt should be conducted in an ethical manner and baiting is not ethical.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling. The use of un-manned cameras or drones can potentially put bears and their off-spring in jeopardy. Again, if hunting is the ultimate goal, it should be conducted in an ethical manner.

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Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It’s better to let nature manage itself than to risk upsetting the balance.

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Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps near locations where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

Carman Bryant

Missouri

PC49

Name: Dee Canale

Community of Residence: Eagle river

Comment:

I believe proposal #3 to aid bear baiters with the use of cellular trail camera should be allowed. There are times I spend 5-6 hours after work to go and check my bait to see if I have bait on the sight for a weekend hunt. This would allow me to see if my sight has bait and prevent me from spending countless hours and money on trips up to my sight.

PC50

Name: Mathew Cannava

Community of Residence: Soldotna

Comment:

I am writing in support of Proposal 29. Every year I fly across the Inlet and spend time with the bears...paying thousands for the opportunity. Based on inadequate and faulty, knee-jerk reasoning, you are killing these bears I and so many others cherish. Understanding and re-evaluating management of the Mulchatna caribou is a no-brainer so that hopefully F+G will stop their mismanagement of predators. Someone needs to tell Stanley that we make decisions based on science...and in consideration of ALL of us...not just consumptive users.

As a 52-year Alaskan resident, I also oppose Proposal 75. The practice of gunning down our beautiful animals from the air is simply sickening. Just stop.

PC51

Name: Carlton Hobbs, Carlton Hobbs LLC

Community of Residence: Tuxedo Park

Comment:

Proposal 75 (OPPOSE): This could open a predator control program in Unit 16, which would allow ADFG to kill wolves, brown bears, and black bears using aircraft, including helicopters.

- Proposal 82 (SUPPORT): One of AWA's own proposals, created with trappers and nontrappers. This would establish 50-yard trapping setbacks along specific trails in the Mat-Su region.

- Proposal 11 (SUPPORT):This would shorten the sp1ing and fall brown bear seasons by one week in Unit 9C, near Katmai, reducing user conflicts in the area.

- Proposal 29 (SUPPORT):This calls for a review of the population and haivest objectives for the Mukhatna ca1ibou herd. Minimum numbers ai·e not being met, and the herd has declined fai·below lower population objectives. This review could abate the predator control program in the area, which, in the two years that it has nm, has killed over 200 bears.

PC52

Name: Kathryn Carssow, NA

Community of Residence: Homer, AK

Comment:

Proposal 75: Oppose. Thispractice is not only not supported by thescience and is opposed by many retired and practicing professionals, it reflects honibly on the image of Alaskans as humane and science-info1med wildlife managers. This invites and suppo1ts involvement of outside interests in Alaska wildlife management. It is unwise, shortsighted and unde1mines suppo1t of the BOG, ADF&G and the Dunleavy administration.

Proposal 29: Suppo1t. YES!!Research is badly needed. Not supp01ting this proposal unde1mines the credibility of the BOG and the Dunleavy administration.

Proposal 82: Suppo1t. This setback protects the interests of all and the safety of trail users. Traps and trapped animals pose a threat to all users and compromise support of trapping by the general and recreating public.

Proposal 81: Suppo1t. Not only is this humane, it is in the best interest of all by allowing the release of pets caught in traps with increased probability of smvival, it provides protection of others from a trapped animal.

PC53

Name: Travis Casperson

Community of Residence: Anchorage

Comment:

I suppo1t Proposal 70, extending the Brown bear season in unit 14 past May 31st.

PC54

Name: Jeff Chadd

Community of Residence: Forsyth, Montana

Comment:

Proposal 18 Comments

There is no biological data to suppo1t this kind of change to the season and ha1vest of bears by drawing pennit only. Hunting is allowed in the Preseive only, and the fishing and bear viewing users can go into the hard Park where hunting in not allowed, that would solve any possible needto change the hunting season and haivest of bears.

In the last 10 years the number of bear viewing and fishing lodge users **in** the Katmai Preserve has grown exponentially. They utilize the Prese1ve the months of June - September for beai·viewing and fishe1men whereas the hunters only have 21 day season in October with ve1y small number of user days.

The reason the bear viewing guides are seeing a possible decline in the numbers of mature male bears is because of the pressure put on the beai·s by the bear viewers and fishing lodges. Mature boai·s ai·e not stupid and will vacate high pressure ai·eas for more remote regions. The hunters have ve1y little impact on the bear population whereas the bear viewers and fishing lodges **in** their large numbers of users and days in the field have a greater impact on the habituating the bear population to human presence.

In addressing the economic contribution to Southcent:ral Alaska, hunters and their guides also provide economic benefits to the villages, town, cities and the State.

"This sustainable economic activity is at risk, as well as the educational and inspirational opportunities provided by this unique bear viewing experience."

The above statement from Proposal 18, is hai·d to understand because 75% of Unit 9C is hard Pai·k and hunters are not allowed to hunt there. How is the sustainable economic activity at risk? and what difference will changing the season and making it a drawing pe1mit affect this activity? There is no risk, the hunting users are utilizing the Prese1ve only for a 3 week season, whereas the bear viewing users and fishing lodge users have at least 3 months to utilize the Katmai Park and Prese1ve.



Chaluka Corporation
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Nikolski, AK 99638
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August 29, 2024

Tanya Lestenkof
Chaluka Corporation
P.O. Box 104
Nikolski, AK 99638
907-575-1238
907-576-2215

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

RE: Proposal 8, Umnak Island, Alaska Unit 10, Alaska Administrative Code Number 5 AAC 92.990(a)(21). Regulation Book: Number 64.

Dear Members of the Alaska Board of Game,

I am writing to follow up on our previous submission, which is currently under the BOG's consideration as Proposal 8, and to provide an expanded explanation of why clarification regarding hunting of reindeer on Umnak Island is necessary.

The community of Nikolski, situated on the Southwest end of Umnak Island is the only inhabited community on the island and has a population of approximately 35 residents. Umnak Island is 67 miles long, and about 17 miles across at its widest point, for a total of approximately 686 square miles. The Chaluka Corporation is one of the largest landowners on Umnak Island, and its holdings include nearly all of the land near the community of Nikolski, where we are seeking to hunt.

Reindeer were introduced to Umnak Island in 1923, and at one point, two off-island native corporations had animals on their land. However, there has never been any effective management of the herd, which has since expanded across the island. Due to concerns about overgrazing and overpopulation of the herds of both feral cattle and reindeer, there was a survey conducted by APICDA that counted 5,082 reindeer and the cattle herd is now estimated at over 10,000 head. These animals regularly enter our village in search of additional food sources, forcing us to fence them out of children's play areas, airport runways, and local grave sites. We are deeply concerned about the risk of overgrazing on the island.

Local residents have not observed any management efforts for the reindeer herd for at least 25 years. The reindeer do not have any branding or visible ear tags, are not fenced, and by all accounts appear to have been born and live in a wild state.

Umnak Island is known for trophy quality reindeer, and at one point, our community operated a hunting lodge in the village which created jobs for local residents and employed up to 30% of our residents in some capacity—a point of pride and a source of seasonal income for our residents. The hunts also provide subsistence harvesting opportunities and even backhaul transportation options for the community.

It has come to our attention that the regulations regarding reindeer hunting on Umnak Island may be unclear, and we would like to confirm that there is a legal path to hunting reindeer on land owned by the Chaluka Corporation. The hunt would benefit the community by supporting subsistence use, creating jobs, and generating income from transportation, fuel sales, and other activities during the hunting season.

We believe these reindeer are wild for the following reasons:

- The animals have been roaming free throughout the island for many years.
- Local residents have advised that there have been no management efforts in at least 25 years.
- The animals are not fenced, corralled, handled, or otherwise under human control. They have established sizable populations on land owned by others, including the local village native corporation and federal and state government tracts.
- Given the large number of animals, it is unlikely that they could be returned to human control. The animals have become a nuisance to the residents of Nikolski.
- The animals are not subject to a grazing lease.
- The herd is composed of animals that appear to have been born in and are living in a wild state.
- None of the hunted or observed animals have exhibited ear tags, brands, or any other physical evidence of ownership or management.
- The local residents, including the leadership of the Chaluka Corporation, believe the animals are fera and have provided compelling evidence that they live entirely in a wild state.

It is our hope that the Board will clarify that hunting is allowable on Umnak Island through a mechanism similar to that used in the Kodiak feral reindeer hunt. However, if there is a compelling reason, we would also support a designation of feral or deleterious exotic wildlife instead, in order to create hunting opportunities and economic development opportunities for our residents. We would also suggest that decision include no bag limits and no closed season. We appreciate the Board's consideration and please do not hesitate to reach out if further clarification or discussion on this matter is needed.

Thank you for your time and dedication to managing Alaska's wildlife resources

Sincerely,

Tanya Lestenkof
Chaluka Corporation

Cc: Ryan Scott

PC56

Name: Maiti Chapman

Community of Residence: Ninilchik

Comment:

75.oppose. 1l.suppo1t 29 supp01t. 57.oppose 58 oppose 59&60 oppose.

Chickaloon Village Traditional Council
(Nay'dini'aa Na' Kayax)

Chief Gary Harrison, *Chairman/Elder*

Philip Ling, *Vice-Chair*

Cheryl Sherman, *Secretary*

Doug Wade, *Treasurer/Elder*

Larraine Wade, *Member/Elder*

Emily Ling, *Member*

Lisa Wade, *Executive Director*

Serena Martino, *Executive Assistant*

December 26, 2024

Re: Comment on proposals for Board of Game Central & Southwest Region Meeting

Ugheli Dzaen (Good Day) Board of Game Members,

Chickaloon Native Village (CNV) or Nay'dini'aa Na' Kayax is a federally-recognized sovereign Tribal Government in Alaska (Federal Register, Volume 47, Number 227, November 24, 1982, and reaffirmed in Federal Register, Volume 58, Number 202, October 21, 1993), with the full power and authority to consult and enter into agreements with local, state, and federal governments at their discretion. Chickaloon Village Traditional Council (CVTC) is the governing body of CNV as recognized by CNV Tribal citizens with the full power and authority to act for CNV. CVTC has a responsibility to provide a government for the good health and welfare of its Tribal citizens and address any needs in its community.

CNV's ancestral territory and customary area of use encompasses much of Southcentral Alaska and extends from the Wrangell St. Elias Mountains and Copper River Watershed to the Talkeetna and Chugach Mountains and Upper Cook Inlet. CNV's traditional area of influence overlaps neighboring Dena'ina Dene and Ahtna Dene federally recognized Tribes. CNV has a responsibility to steward and protect the environment, cultural resources, and the health of Tribal Citizens and community members in perpetuity. Actions that occur within CNV's traditional ancestral territories may impact our environment, the cultural resources including fish and wildlife, and the health, safety, and welfare of our Tribal citizens.

Ahtna Peoples, including CNV Tribal citizens, have long managed wildlife populations using traditional practices deeply rooted in cultural and ecological knowledge. Principles such as selective harvest of moose and caribou and respect of predators are embedded in Ahtna culture. These principles are reflective of Ahtna's belief in maintaining balance within the natural world and respecting the natural roles of predators to manage healthy prey populations (Hoy et al. 2022). We question the efficacy of killing wolves and bears to increase moose populations without understanding why there is an imbalance in the predator-prey system. Research in Alaska shows little benefit of this method (Miller et al. 2022). Instead, we advocate for long-term, ecosystem-based strategies including habitat restoration and enhancement, which better align with culturally respectful practices.

The extractive industry of sport hunting within Ahtna lands has led to degraded wildlife populations, disrupting the natural balance and threatening ecosystem health. Prioritizing hunting permits over maintaining healthy animal populations perpetuates an extractive approach that harms not only the environment but also all people who depend on it. We appreciate the opportunity to provide comments on the proposals listed below:

PO BOX 1105 Chickaloon, Alaska 99674 **Phone (907) 745-0749 Fax (907) 745-0709**
e•mail: cvadmin@chickaloon-nsn.gov **Home Page: http://www.chickaloon-nsn.gov**

- **Proposal 2 and Proposal 3**: CVTC opposes these proposals, which increase the use and ease of hunting with bear baiting. Such practices are inconsistent with Ahtna cultural values and ethical wildlife management.
- **Proposals 40, 41, and 42**: CVTC supports these proposals to increase population objectives and reduce harvest objectives in Unit 13. This will contribute to more sustainable management. Unit 13 is under an intensive predator management program, and we do not support increasing the kills of wolves or bears unless in a selective manner based on a well-studied understanding of predator-prey relationships and habitat.
- **Proposal 49**: CVTC supports this proposal by the Ahtna Intertribal Resource Commission to close Nelchina herd caribou hunting for six years or until the herd reaches the midpoint of the management objective of 37,500. This action would allow the population to recover and aligns with Ahtna practices of sustainable harvesting. Without this, ADFG risks opening up hunts during a year when the herd has reached the low point of the management objective but may still be susceptible to rapid declines due to severe winter or habitat changes.
- **Proposal 65**: CVTC supports this proposal to reduce antlerless moose hunt permits, thereby reducing stress on moose populations during the fall and winter seasons. We suggest an amendment to remove the hunting of cows accompanied by calves.
- **Proposal 75 and Proposal 78**: CVTC opposes these proposals, which advocate for increased intensive management of predators. These practices disrupt ecological balance, show little efficacy in Alaska (Miller et al. 2022), and go against Ahtna principles. We note that ADFG Unit 13 is part of an intensive management program, yet this has not caused a significant or long-term increase in moose populations.

The Ahtna belief system emphasizes the interconnectedness of all life and the importance of stewardship practices that honor this balance. Intensive predator management strategies, such as culling, fail to address the root causes of wildlife population declines, such as habitat degradation. We urge the Alaska Department of Fish and Game to prioritize habitat improvement and conservation strategies that align with both scientific understanding and Indigenous cultural knowledge.

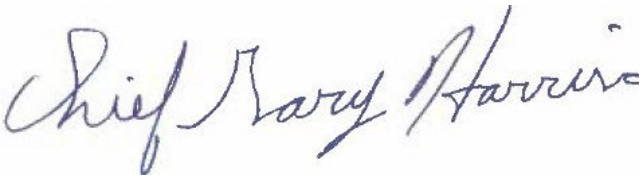
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Miller, SD, DK Person, and RT Bowyer. 2022. Efficacy of killing large carnivores to enhance moose harvests: new insights from a long-term view. *Diversity (14), 939.*

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e•mail: cvadmin@chickaloon-nsn.gov **Home Page: http://www.chickaloon-nsn.gov**

May Nek'eltaeni (Creator) Guide our Footsteps,



Traditional Chief Gary Harrison, Chainnan
Chickaloon Village Traditional Council

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December 27, 2024

Subject – Reinstate Unit 9E, 9D season to 21 Days; Spring/May 10-31 and Fall/Oct. 1-21.

The Chignik Lagoon Native Corporation is submitting this letter in regards to reinstating the Unit 9E, 9D hunting season to 21 days. The areas of Unit 9E and 9D directly affect the Chignik Lagoon region and the shareholders of our corporation.
Culturally and economically this proposal would be beneficial in that it would assist in controlling the bear population whose main diet consists of salmon and give the hunters more of an advantage within the season.
Another consideration is that transportation to this area is very challenging and sometimes can take up to 2-3 days to arrive depending on the weather. Lengthening the season would make the whole operation more efficient in this regard.
Since 2018, the Chignik salmon run has had disastrously low counts for the early and late run which has crippled the communities. The passing of proposal #9 is just one of the ways this can help out our area.
In closing, we respectfully ask for the approval of this proposal for the ecology, economy and culture of our area and that the economic disasters that has affected this area be heavily weighed in this decision.

Sincerely,

Angela Gregorio

Angela Gregorio
Operations Manager
Chignik Lagoon Native Corporation

PC59

Name: Heather Clnystie

Community of Residence: Canmore

Comment:

I am wiiting to oppose proposal 75 andsuppo1t proposal 11. Our world and our success as hwnans depends on functioning natural systems, of which predators are an essential pait. Archaic practices like gunning animals from helicopters have no place in a sustainable world future.

PC60

Name: Michael Opheim, Chugach Regional Resources Commission

Community of Residence: Seldovia

Comment:

November 14, 2024

Alaska Board of Game

P.O. BOX 115526

Juneau, AK 99811-5526

The Clmgach Regional Resources Commission suppo1ts proposal 49 to eliminate the harvest of Nekhina Caribou, submitted by Ahtna Inte1tribal Resource Commission (AITRC).

The Nelchina Ca1ibou herd has been an essential resource to Alaska for many years, but more impo1tantly, it has sustained the Ahtna people since time immemorial. The peak size of the Nekhina Caribou herd was reached in the early 1960s at around 71,000 caribou (Population Growth and Movement Patterns of the Nelchina Caribou He Caribou Herd, J.E. Henning U.S. BLM). The population has been experiencing a signi□icant decline, and in more recent years, the population has dropped to its cunent level of 7-8,000 animals. This is approximately 10% of the herd population in the 1960s. This signi□icant decrease in the population cannot be ignored. Amorato1ium on hunting the Nekhina Cadbou is not a decision made lightly as it is such an essential resource to tl1e Ahtna people. However, because of its impo1tance, we suppo1t the AITRC proposal and believe this moratorium is needed. Ahtna Inte1tdbal Resource Commission has made the difOicult decision to do the light thing for their subsistence resource. This decision profoundly impacts the Ahtna people who have relied on this impo1tant resource for millellllia. We must look at other examples across Alaska, like the community ofTyonek, which relied upon Beluga Whales. When the whale population declined to the point where it was not sustainable to haivest, the people made the sel□less decision to suspend hunting until the Beluga population recovered.

The state of Alaska needs to make hard decisions when we see resources being depleted into a strategic state. We must consider future generations and their ability to have the resources we have today. Data shows the Nekhina Caiibou herd decline, with no evidence as to a real reason for why this herd is declining. We can point the Dinger at hai·sh weather, over-ha1vesting, predation, or climate change, but

until we can Digure out a way to save this resource and improve herd nmnbers, CRRC joins the Ahtna people in supporting this moratorimn.

We are thankfol for this opportl.mity to support this proposal and the AHTNA Inte11Iibal Resource Commission.

Willow Het1ick-P1ice

Executive Director

Clmgach Regional Resources Commission

PC61

Name: Donna Claus

Community of Residence: McColl Ridge Alaska

Comment:

Pertaining to Proposals 51 and 52 in opposition

Dear Board of Game,

I am an Alaskan resident. I am a hm1ter. Spo1t and Subsistence. My husband and I own a business which takes recreational folks out exploring eve1y day all summer to see this magnificent cOlmtly and as hunting guides in fall. We make our living thliving in this wilderness. We have lived our lives at the base of McColl Ridge for the 42 years of our maniage, raising thl·ee children here. We are on land my husband's father claimed while guiding here before it was a National Park. I am sitting in our dining room looking out on that land as I type.

I find it ve1y interesting that we are beingsingled out to stop our business on McColl Ridge. It is because we live here year around that we have a great affinity for these mountains and the animals they support, we are dependent on maintaining our business as guides both to recreational and hm1ting clients to smvive here. We take great p1ide in managing our take of the animals to sustain a healthy population for eve1yone. We watch animals all year, seeing how winter affects them as we live it too, watching the babies born and lambs learning to stand lmder their mothers to ward off the golden eagles intent on them, we see the little ones matl.lre and know the predators of the area. Just yesterday, we had two wolves visit us down here. They want my chickens I think..Easier than tl1e sheep above.

Eve1y year, my husband does a sheep smvey to see how many are still alive after our brutal winters. He decides on how many of our hm1ters to take on this1idge by KNOWING this colmt1y in all its seasons. He keeps ti·ack of resident hlmters and ti·ies to know where they are as we do not want our hunters hindering them or vica versa. It is getting harder and harder as the residents seem to want to be m1seen. We would ask that they don't tiy to hide so well so we can see them and AVOID them. We love to go hunting on our own and being alone is the best. When people hide we are hard put to avoid them.

All of the landing areas on McColl Ridge were pioneered by us and previous guides. It is because ofus that residents can access the area so easily. They even use a ti·ail that our father built in the early 60's to access the mOlmtain. We are here and cannot even illllumerate the number of crises we have mitigated for resident hlmters, from plane crashes, to falls, to smlk boats, to being lost. We could tell a lot of sto1ies.....

We have helpedso many through the years DUE to being here and being ready to help, even those who want to do away with us.

Thank you for all the work you do on the board. WHEW! I can't even imagine trying to manage all the info1mation you receive. I do appreciate what that entails and my hat is off to you for even wanting to be there.

Just for the record I oppose both 51 and 52.

PC62

Name: Jay Claus

Community of Residence: Palmer

Comment:

Opposition to Proposal 51 and 52

In regards to resident only geographic area defined as to Proposal 51 and 52.

I am a life long resident of Alaska who hunts annually and plan to continue to do so for all legal big game species in Alaska. I am also a registered guide, though I haven't guided a hunt in six years. I am an avid resident hunter first and foremost but I suppo1t non-resident hlmting rights, in pait due to the incredible economy that the guide industiy brings to the state of Alaska.

I oppose proposal 51 and 52 (which have the same premise) for a vai·iety of reasons.

Reasons I oppose these proposals ai·e as follows:

#1.

It is my opinion and of others, that the guide indust1y is being attacked unjustly by the resident lnmting commlmity. They (residents hunters) feel that they are disenfranchised, have too much competition in the field, and animal numbers are diminished as a direct result of guiding. Also, unfo1tlmate negative encounters with rouge guides while hunting can impact their view. This is not the n01mality as whole but it is unfo1tlmately what is remembered. The majority if guides follow the rnles because their livelihood depends on it.

Resident hunters might also feel that they have less chance of a successful hunt based on statistics while competing for the same stock of animals as the guides. If you consider the fact that resident hunters already have an upper hand to guides because of "resident only" laws afready in place, it seems a bit childish.

This kind of proposal only adds to a precedent and notion that all guides are bad in the world, and only resident hlmters should even be aloud to hlmt.

We need not forget that as wonderful as it would be for all of us to have om own hlmting utopia just for ourselves, this is not realistic. That kind of selfish mentality and closed mindedness is damaging to those that depend on a livelihood from this industiy. This is not a battle of Resident vs. Nonresident. On the contra1y, it is a battle of Resident vs. Guides. Let's just get that straight from the sta1t.

I believe that game laws should be established with "Game" as the priority, not trying to allocate to entitled resident hunters. Let me use the example of the closure of Unit 19 Dall Sheep to all Non Residents. This law had nothing to do with conservation, period... It was biased towards a small batch of resident hunters. There was a problem in 19 that needed to be addressed, of course we can agree on that. From a conservation standpoint, we needed to limit hunting there due to low sheep population numbers. That is undeniable and especially the guides agreed to that point. But if you only limit one half of the problem, it does nothing, it's just a ruse to make the resident side happy and the game still suffers in the end.

This kind of precedent in my opinion needs to stop! Which is why I oppose this.

#2.

On the premise that there is a lodge in close proximity to McCall ridge.

Well yes this is true, but there are hunting camps and lodges in almost every major river valley in the state of Alaska. If you were to use this as reasoning, you would indeed need to close the entire state to nonresident hunters. That's like saying that only residents should hunt unit 14 for example. How many guides and outfitters do you think base out of Palmer, Wasilla, Anchorage, Girdwood etc.? They, guide/operate, and live, in close proximity to where they hunt do they not?. . Why does having a base of operations in proximity to where you guide now become a reason to punish their purpose?

This notion is Ludacris of course.

#3

If you define a Geographic area as solely for the purpose of one user group, where does it end? Especially in such a remote and logistically complicated place as the Wrangell's. This is a dangerous notion and path to start down. It needs to be equal opportunity for all, including the people that make a living in any given geographic location (including the guides). The residents (which I am one) have plenty of opportunity and even more individual rights as it stands now. This is true. We do not need to create law and endowment when it is not backed by a realistic argument for the sake of all parties involved. Especially the Game animals that live there. McCall ridge has an extremely healthy sheep population of which there are plenty of the resource for all parties that pursue them in the name of fair chase. This I humbly can verify, as I have hunted there since childhood.

I do not support these proposals.

Sincerely,

Jay Claus.

ridge.

I am a life long resident of Alaska who hunts annually and plan to continue to do so for all legal big game species in Alaska. I am also a registered guide, though I haven't guided a hunt in six years. I am an avid resident hunter first and foremost but I support non-resident hunting rights, in part due to the incredible economy that the guide industry brings to the state of Alaska.

I oppose proposal 51 and 52 (which have the same premise) for a variety of reasons.

Reasons I oppose these proposals are as follows:

#1.

It is my opinion and of others, that the guide industry is being attacked unjustly by the resident hunting community. They (residents hunters) feel that they are disenfranchised, have too much competition in the field, and animal numbers are diminished as a direct result of guiding. Also, unfortunate negative encounters with rouge guides while hunting can impact their view. This is not the normality as a whole but it is unfortunately what is remembered. The majority of guides follow the rules because their livelihood depends on it.

Resident hunters might also feel that they have less chance of a successful hunt based on statistics while competing for the same stock of animals as the guides. If you consider the fact that resident hunters already have an upper hand to guides because of "resident only" laws already in place, it seems a bit childish.

This kind of proposal only adds to a precedent and notion that all guides are bad in the world, and only resident hunters should even be aloud to hunt.

We need not forget that as wonderful as it would be for all of us to have our own hunting utopia just for ourselves, this is not realistic. That kind of selfish mentality and closed mindedness is damaging to those that depend on a livelihood from this industry. This is not a battle of Resident vs. Nonresident. On the contrary, it is a battle of Resident vs. Guides. Let's just get that straight from the start.

I believe that game laws should be established with "Game" as the priority, not trying to allocate to entitled resident hunters. Let me use the example of the closure of Unit 19 Dall Sheep to all Non Residents. This law had nothing to do with conservation, period... It was biased towards a small batch of resident hunters. There was a problem in 19 that needed to be addressed, of course we can agree on that. From a conservation standpoint, we needed to limit hunting there due to low sheep population numbers. That is undeniable and especially the guides agreed to that point. But if you only limit one half of the problem, it does nothing, it's just a ruse to make the resident side happy and the game still suffers in the end.

This kind of precedent in my opinion needs to stop! Which is why I oppose this.

#2.

On the premise that there is a lodge in close proximity to McCall ridge.

Well yes this is true, but there are hunting camps and lodges in almost every major river valley in the state of Alaska. If you were to use this as reasoning, you would indeed need to close the entire state to nonresident hunters. That's like saying that only residents should hunt unit 14 for example. How many guides and outfitters do you think base out of Palmer, Wasilla, Anchorage, Girdwood etc.? They, guide/operate, and live, in close proximity to where they hunt do they not?. . Why does having a base of operations in proximity to where you guide now become a reason to punish their purpose?

This notion is Ludacris of course.

#3

If you define a Geographic area as solely for the purpose of one user group, where does it end? Especially in such a remote and logistically complicated place as the Wrangells. This is a dangerous notion and path to start down. It needs to be equal opportunity for all, including the people that make a living in any given

geographic location (including the guides). The residents (which I am one) have plenty of opportunity and even more individual 1ights as it stands now. This is trne. We do not need to create law and endowment when it is not backed by a realistic argument for the sake of all paities involved. Especially the Game animals that live there. McCall ridge has an extremely healthy sheep population of which there ai·e plenty of the resource for all paities that pursue them in the name of fair chase. This I humbly can verify, as I have hunted there since childhood.

I do not suppo1t these proposals.

Sincerely,

Jay Claus.

PC63 intentionally left blank

PC63

PC64

Name: Peter Coleman

Community of Residence: Montrose, MN

Comment:

Concerning propositions 58 and 59, I wish to register my opposition to ai1y attempt to ftnther reduce the wolf population by expanded hunting or trapping effo1ts. The wildlife population on all federal lands should be managed in accordance with the wishes of the entire U.S. population, not just Alaskan interests, in my opinion.

PC65

Name: Willie Copeland

Community of Residence: Wasilla

Comment:

Proposal 81- I oppose this proposal because it eliminates or rest1icts the ability of young trappers within area 14a. It is more effective and safer to teach a youth how to trap in daylight; however, sho1t daytime hours dming the trapping season or school hours make it impossible for them to check traps in daylight during the school week. This proposal does not consider traps that quickly dispatch or target animals or that most wildlife does not eat daily. Additionally, even maintained public roads are often not passable during or after severe storms.

PC66

Name: Christopher Cork

Community of Residence: Palmer , AK

Comment:

Proposal 3. We as a community, need to do all we can to assist in knocking the bear numbers way down. Not only do I agree with the proposed changes. I would like to see a bounty put on bears in 16A and B.

And as far as proposal 70 goes.

I don't even feel there should be a close season in 14 A or B

PC67

Name: Michele Costello-Lettau

Community of Residence: United States of America

Comment:

SEE ATTACHED

COMMENTER: Michele Costello-Lettau

PROPOSAL: OPPOSE Proposal 33 and 34-the motion to aerial gunning of Alaskan Brown bears, Black bears, wolvesand Wolve1ines smrnunding Lake Clark.

ACTION: I would like ve1ification that the board will consider my comments.

SUBJECT: Opposition to Aerial Gmming of Bears, Wolves and Wolverinesin Alaska

I vehemently OPPOSE the ae1ial gunning down of ANY wildlife. This is akin to the Trail of Tears-fainilies mnning for their lives whilst being used as target practice. Using wildlife for spo1t hunting is target practice and not only inesponsible but reflects the values, morals and character of those who paitake in tl1is archaic practice.

I am w1iting to strongly oppose the proposal to allow the aerial gwming of black bears, brown bears, wolves and wolverinesin Alaska. Such a practice is inhumane, ecologically irresponsible, and tarnishes Alaska's reputation as a leader in wildlife conservation.

Black bears, brown bears, wolves and wolveiines are critical to the health and balance of Alaska's ecosystems. Removing these species through indiscriminate and violent means such as aeiial gunning dismpts ecological balance, leading to unforeseen consequences for the enviroll1llent. Moreover, wolverines are elusive and already face challenges in maintaining stable populations due to their slow reproductive rates and specific habitat needs.

The use of aerial gwming is an unnecessa1ily cmel method that fails to align with ethical wildlife management practices. It causes undue suffeiing and often results in unintended deaths of non-target animals, including cubs left mphaned to die of struvation. This approach is a far c1y from responsible stewru·dship and reflects poorly on the values of respect and conse1vation that many Alaskans hold dear.

Historically, such aggressive eradication practices echo dru·ker chapters of histo1y where entire populations were devalued and destroyedwithout regru·d for their intdnsic worth. We must learn from these mistakes and take a path rooted in respect, coexistence, and sustainable management.

Rather than reso1ting to such extreme and bmtal measures, Alaska Fish and Game should pdoritize humane, science-based management solutions. Non-lethal strategies such as improved habitat management, conflict mitigation programs, and public education about living alongside wildlife have been proven effective in other regions andshould be p1ioritized here.

Alaska's iconic wildlife is a treasure to be prese1ved for future generations-not treated as expendable. I urge you to reject this proposal and instead embrace ethical and sustainable practices that honor both wildlife and the ecosystems they suppo1t.

PC68

Name: Teny Cummings

Community of Residence: Anchorage, Alaska

Comment:

I am strongly opposed to Proposal 75: This proposal would not solve the problems brought about by climate change, absence of food, heavy snowfall, and disease. Giizzly beru·s ru·e the slowest reproducing mammals in N01th Ameiica and killing these majestic

creatures would disrupt the working ecosystem. Beru·s and wolves ru·e essential to a working ecosystem and as you know weed out the diseased and weak and insure the health of the herd. They ru·e not responsible for the decline of hundreds of thousands of caribou. Not to mention that shooting them from helicopters is inhumru1e and the killing of females ru1d cubs is not just reducing numbers, but is eraticating the

species.

I suppo1t Proposal 82: Trapping setbacks are needed in this area near Palmer for the safety of people and pets.

I support Proposal I I: This proposal would stop conflicts and is necessa1y to stop conflicts.

I support Proposal 29, Mulchatna Caribou Herd Population Review:

It is a scientific fact that disease, lack of food, heavy winter snowfalls are the cause of decline and are not predators. Why shooting grizzlies and moose with helicopters is

being undertaken is being done is beyond me. These animals belong to the people of Alaska and the majority of the residents find this practice horrific. Letting almost 200 bears lay in the summer sun and rot for the last two years gives me nightmares. It must stop. Disease will spread in the herds. Over harvesting of the female caribou is a big problem as females are the preferred subsistence choice.

Commentor: Carol Damberg

Location: Anchorage, AK

Email: [redacted]

PROPOSAL 11 - *5 AAC 85.020, Seasons and bag limits for brown bears. Shorten the spring and fall brown bear hunting seasons in Unit 9C. Shorten the brown bear hunting season by one week in both spring and fall to the former dates of Oct 7-21 and May 10-25, respectively.*

I SUPPORT PROPOSAL 11

Jennifer Culbertson, who submitted this proposal, is intimately familiar with GMU 9 and the impacts of bear harvest seasons on a diversity of user groups (hunters, anglers, observers, photographers, etc.). This proposal is not about reducing bear harvest but rather about reducing user conflicts that have been clearly documented by the author of this proposal. Having reviewed the proposal, I am disappointed the BOG chose to lengthen the bear season in 2022, knowing the potential for conflict within 9C, that is known to attract large numbers of non-hunters. To shorten the season is appropriate to reduce such user conflicts. Reverting back to a shorter season will not hinder the harvest of bears as per the long history of harvest that occurred with the shorter season (see ADFG comments and graphics). There is no harm to hunters if the season is shortened back to its pre-2022 length. However, there has obviously been unfortunate consequences for non-hunters as a result of the BOG's 2022 decision (as the proposal identifies).

Why the ADFG opposes this when in 2022 they wrote "The department and Board of Game have for decades supported short seasons and reduced bag limits for nonresident and resident hunters in Unit 9 for bear conservation and hunt quality." In 2022, the ADFG recognized "bear conservation and hunt quality" as important! What has changed? In addition, the ADFG indicates that shortening the season in Units 9 D&E "showed no significant decrease in brown bear harvest, just a different distribution of when bears were harvested. It is anticipated that this unit would show the same trend with no overall decrease in brown bear harvest."

I urge the BOG to shorten this season to reduce user conflicts and think beyond just the hunter and incorporate a common-sense solution that allows all user groups to be successful. This is not an "unnecessary" reduction in bear hunting opportunity, but rather the necessary reduction in season length to preserve quality wildlife experiences for the hunter and non-hunter.

PROPOSAL 29 **-** *5 AAC 92.108 Identified big game prey populations and objectives. Review population and harvest objectives for the Mulchatna caribou herd.*

I SUPPORT PROPOSAL 29

Pat Walsh, who submitted this proposal, is a retired professional biologist who worked for 23 years in the GMU's that impact the Mulchatna Caribou Herd. His proposal is well thought out

and clearly articulates why the population and harvest objectives for the Mulchatna Caribou herd need to be reviewed based on habitat quality.

The ADFG noted "a number of factors contribute to the low population level." Having a transparent process to scientifically assess and analyze the many factors affecting caribou populations would greatly benefit in the management of the herd. One of the primary focuses needs to be an assessment of the areas habitat to support caribou. The loss and degradation of habitat is the largest threat to caribou. Therefore, understanding the condition of habitats is fundamentally important for developing objectives. Lichen distribution and abundance is a vital dietary need for caribou (aka- a limiting factor controlling the size of a population) and needs to be assessed to determine viable and sustainable population objectives. Pat Walsh speaks directly to this issue and its impact to setting reasonable population and harvest objectives.

The current population objective (30,000-80,000) was established in 2008 at which point the population was estimated to be 30,000. **This objective has been achieved only once in past 17 years (2015)**. His argument that population and harvest objectives be adjusted to an ecologically sustainable level, based on habitat, should be standard procedure for the ADFG, especially in the face of climate change. As stated by the ADFG in their comments, the current population is about 14,500 which is half the MINIMUM objective of 30,000. It has been at or below this level for the past 8 years.

> So, I would ask the ADFG what criteria they use to determine when they will re-assess the population and harvest objectives for a caribou herd? What triggers them to lower or increase a population or harvest objective? Is climate change and it's impacts on habitat a factor they consider and how is it incorporated into their modeling and decision making?

The ADFG states that they "believe the range can support at least 30,000 caribou" but offer no biological or habitat data to support that belief?

The ADFG states in their comments - "The BOG established the current harvest objective for the MCH of 2,400–8,000 animals in 2008. The last time reported harvest **exceeded the minimum harvest objective of 2,400 caribou was in 2003 (21 years ago)."** So perhaps it is time to reassess?

I urge the BOG to fully adopt this proposal. The Department is Neutral and clearly articulates it intends to shoot more predators in 2025 as they indicated "IM efforts have likely contributed to bolster calf survival" based on the 2024 calf: cow composition survey. However, the long-term survival of calves has yet to be determined, and other than counting dead bears, the ADFG accounts for no other factors potentially influencing the current cow: calf ratio. They indicated new research that says there is "high pregnancy rates (>90%)" and "births of viable caribou were high." These statements made without background data should be viewed with caution. Having the actual habitat assessed is a significant missing link to making decisions on setting

population objectives. Funding to assess habitat and the impacts of climate change seem like a more prudent use of funds then aerial shooting predators.

PROPOSAL 75 - ***5 AAC 92.122. Intensive Management Plan VI.***

Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan as follows:
5 AAC 92.122
…
(b)
(4)
…
(B) notwithstanding any other provisions in this title, the commissioner may issue public aerial shooting permits or public land-and-shoot permits as a method of wolf removal ***and may allow department employees to conduct aerial, land and shoot, or ground-based lethal removal of wolves and black bears and brown bears using state-owned, privately-owned, or chartered equipment, including helicopters, under AS 16.05.783.***

I OPPOSE PROPOSAL 75

I have lived in Alaska since 2012, I have hunted most my life in both the lower 48 and AK. I have a Masters in Wildlife Management and spent my career as a land manager and/ or biologist working to ensure wildlife management is conducted based on science and that management considers the voices of all people and future generations.

With this proposal the State would be adopting yet another flawed and insufficiently designed approach to management of moose and predators. Factors other than predation may affect dynamics of moose populations such as winter severity and forage. Harvest of moose also may depend upon a variety of factors including hunting regulations (e.g., quotas, season length and timing, effort, motivation, use of guides, equipment, and other variables). For predator control to be an effective mechanism to increase moose harvest, it must be implemented only when accounting for many variables. Additional information regarding factors influencing moose abundance and harvests should be more fully considered before predator control is applied as a general management procedure for GMU 16. It is especially relevant, in the light of climate change, that better data concerning the habitat is assessed relative to moose population objectives? None of this appears to be assessed in this proposal and hence trying to manage for a hypothetical moose population objective, that may never be achieved, is inappropriate and a false argument for killing predators that are vital to maintaining Alaska's ecosystems and valued by many, not only for hunting but also viewing.

In this proposal there is no mention of how many moose are taken by wolves or bears? There is no discussion about how the habitat changes in the unit may be influencing the lands carrying capacity for moose. There is no discussion or evaluation of climate change impacts to moose survival (winter severity, heat, icing events, etc.). There is no assessment of moose harvest

statistics and the potential illegal take of moose. There is no discussion about disease threats that may be influencing moose populations. Instead, it is the immediate knee jerk reaction to kill bears and wolves. There is no discussion about the impacts to non-consumptive users who flock by the thousands to try and see these carnivores each year at Denali and Lake Clark National Parks. There is no disclosure about the financial cost of implementing this plan directly, nor indirectly due to lost guiding and tourism opportunities. There is no current scientific research or summary of historic research that would support the actions in this proposal to now allow aerial gunning of wolves and bears throughout Unit 16.

The State should not invest significant funding to kill the wildlife that so many Alaskans value to view and hunt, http://www.adfg.alaska.gov/index.cfm?adfg=ongoingissues.economicstudy). The money would be better spent on assessing the actual impacts of these practices via research to understand if such practices are actually working. My guess is the State would rather not invest in more research, as research has already indicated such practices do not make significant differences and instead do more harm then good.

It is disheartening to see the ADFG continue to adopt IM as its primary tool to manage wildlife populations in Alaska. They have liberalized predator hunting regulations, and continue to do so, to an extent that allows hunters to do defacto predator control. The ADFG's support for the IM management philosophy and adoption of these regulations, without the scientific basis to support such killings, fails the basic principles of the North American Model of Wildlife Conservation (NAMWC). The NAMWC sets the guiding principles that has led to the form, function, and successes of wildlife conservation and management in the US and Canada. The North American Model of Wildlife Conservation has seven basic tenets that support the notion that wildlife is a public trust, an American birthright, and that wildlife species need to be managed in a way that their populations will be sustained forever. Relevant tenets the State continues to violate include:

- Scientific Management of Wildlife: The best science available will be used as a base for informed decision-making in wildlife management. *The State refuses to invest in long term research to evaluate their management practices that involve I&M and often make decisions on harvest of predators with no recent predator population information*.

- Wildlife Should Only be Killed for a Legitimate Purpose: Individuals may legally kill certain wild animals under strict guidelines for food and fur, self-defense, and property protection. Laws prohibit the casual killing of wildlife merely for antlers, horns or feathers or the wanton waste of game meat. *ADFG promotes liberalized harvest that results in wanton waste via year-round seasons, etc. ADFG wastes wildlife via their aerial gunning programs as wolves and bears are often not recovered or harvested at times when pelts have no value.*

- Rule of Law: Laws and regulations developed by the people and enforced by state and federal agencies will guide the proper use of wildlife resources. *The State rarely adopts wildlife regulations that reflect the needs of non-hunters. This is because the BOG is appointed by the*

Governor and hence politically influenced. A mandate to have a more diverse BOG made of hunters, guides, biologists, and non- consumptive users would provide a more balanced and proper use of wildlife resources that is reflects the needs "of the people". The State could advocate for this.

PROPOSAL 82 : *5 AAC 92.550. Areas closed to trapping.* Require 50-yard trapping setbacks from known multi-use trails in Units 14A and 14B.

I SUPPORT PROPOSAL 82

The Alaska Wildlife Alliance has done the due diligence to respectively work to ensure this proposed regulation would safeguard that trappers are allowed to trap while decreasing the risk of conflicts with humans and pets, that utilize these trails frequently.

Many people live in Alaska for the year-round recreational activities, and tens of thousands of people in Units14 A & B and surrounding areas enjoy multi-use trails during the trapping season. This proposal respects the rights of trappers to utilize multi-use trails, and seek reasonable, regulated boundaries that ensure safe multi-use on some trails for the benefit of thousands of other trail users. The goal of this proposal is not to unduly restrict trapping, but to protect and reduce the uncertainty for users of multi-use trails by providing defined boundaries on trap placement.

Successful adoption of similar trapping restrictions in a diversity of locations throughout AK is reason to support this proposal and provide balanced regulations that consider all affected user groups when it comes to development of wildlife harvest regulations.

The Alaska Wildlife Troopers (AWT) has a valid concern about enforcement of this regulation given there are no trap identification requirements. AWT deals with this issue when trying to enforce any trapping regulation due to the in-action of the Board to pass a regulation requiring trap identification information on traps. This argument cannot be used to refuse the passage of this proposal any more so than former proposed regulations dealing with trapping. Having no trapping identification requirements makes almost all trapping regulations unenforceable. I hope the BOG will remedy this issue in the future and hold trappers accountable. The identification of trails is specified and can reasonably be enforced. As a former Law Enforcement officer, I am certain that if there are uncertainties about the traps placement that officers will not issue violation notices they know will not prevail in court and offer a warning instead. They would also make recommendations to remedy the issues. The issue of erosion of trails is likely minor and can be easily remedied in the future as needed (adaptive management). The updating of trail maps and locations is similar to updating any other boundary regulations as conditions change, and would hopefully be remedied appropriately. I do not find any of the issues AWT has respectively put forth as a reason to not support this proposal. Each potential issue has a remedy that is practical to fix.

PROPOSAL 3 – *5 AAC92.044.(b)(13). Permit for hunting bear with the use of bait or scent lures. 5 AAC 92.080 (7)(G)(H). Unlawful methods of taking big game; exceptions. Allow use of cellular cameras for taking black and brown bear over bait in Units 9, 11, 13, 14A&B, 16, and 17.*

I OPPOSE PROPOSAL 3

This is another proposal to increase predator control by liberalizing regulations to allow remote cameras to monitor bait stations and increase the efficiency of take. Ther is no fair chase involved. It is directly an attempt to increase harvest. The proponent indicates this would be an easy regulation to enforce. The gray areas abound when it comes to the use of live Action Game Cameras. The speculations, in fact, could go on forever, and possible infractions in the field may or not be easily defensible. The AWT pointed out valid concerns in the past and hence why such methods were prohibited since 2017. Hunting is getting out and finding the game. Bait stations have enhanced efficiency for bear harvest significantly, especially for brown bears, in addition to the same day airborne regulations. I suspect that harvest of bears would definitely increase with this technology. It certainly makes one ponder the definition of "Hunting." Boone and Crocket, Pope and Young and other trophy organizations prohibit such uses.

Please listen to the wisdom of the AWT's and their comments. "They caution the board that if adopted, this proposal may result in Troopers having a difficult time proving what species a cellular camera was being used to target thus rendering the remaining prohibitions for use in targeting other species within the same GMU's essentially unenforceable."

PC70

Name: Jake Davis

Community of Residence: Wasilla

Comment:

Proposal 11: SUPPORT. Stop prioritizing the needs of a few "trophy" hunters over the needs of the majority of Alaskans who prefer to recreate without the sound of a 1ifle going off eve1y 5 minutes; who prefer to obse1ve native wildlife in the wild instead of on a wall.

Proposal 29: SUPPORT.

Proposal 75: OPPOSE. Slaughtering native wildlife through aelial gunning is not only the definition of cowardly, it is ineffective. The impulsive killing of predator species has repeatedly failed to achieve the underlying "goals" wherever it takes place. Wolves and bears do not decimate ungulate populations, they enhance those populations because predators kill the sick and geliatric members of ungulate herds thus allowing the stronger gene pool to passon. Decimating wolf packs and brown and black bear populations destabilizes ecosystems. For example, wolves, as top predators, have a cascading beneficial effect on all the trophic levels below them. When wolves are on the landscape, elk and moose can no longer sit in one place and eat eve1ything nearby; they are forced to keep moving in response to wolf predation. This has many benefits. When wolves chase elk or moose during a hunt, the ungulates are forced to nm faster and faither. As they nm, their hooves aerate the soil, making it p1ime for water retention and allowing more grasses to grow. Since ungulates cannot remain stationa1y for too long, aspens and willows in one area are not heavily grazed, and can fully recover between migrations. This means that avian populations retain a healthy habitat. The trees even shade the rivers, making the water colder, and cold water holds more oxygen, which providesa boost to fish populations. The bears also benefit from vegetationstability, and in tum, as top predators, help reinforce the effect of the wolves on prey species. In essence, by conserving the top of the food chain, predators like wolves create benefits for the whole ecosystem. A wild wolf population makes for a stronger, healthier, and more balanced ecosystem, which includes herbivores. From plants to insects to ungulates to people - eve1ything stands to benefit from wolves. The list goes on. Wolves and bears are pa1t of what makes Alaska unique.It is a twisted reality indeed when the powers that be seek to slaughter native wildlife through aerial gunning without scientific input or a detailed study as to the ha1ms the tmchecked killings might cause ecosystems at large.

Proposal 82: SUPPORT.

PC71

Name: Rebecca Davis

Community of Residence: Blythewood, SC

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 1O, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Rebecca C. Davis DATE:12.27.24

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

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Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

Rebecca C Davis

[redacted]

[redacted]

PC72

Name: Caitlin Delligatti

Community of Residence: United States

Comment:

As a wildlife photographer and tomist in Alaska, I find the overlap in brown bear hunting and viewing seasons concerning. While I understand the need to control populations through hunting, the increasing popularity of Alaskan brown bears brings with it an additional concern for the safety of travelers while viewing wildlife. I do not feel safe visiting dming hllllting seasons and feel they should be sho1tened to minimize the overlap in prime travel and viewing seasons as outlined in proposal 11 which I strongly suppo1t. Additionally, the popularity worldwide of the bears of the Katmai area also merit reduced hllllting seasons and numbers as many individual bears are well known to the public. To promote future tomism and continue conservation awarenessand education, I strongly suppo1t proposal 18 to fu1ther limit hunting in that area.

PC73

Name: Jacqueline Deming

Community of Residence: Florida

Comment:

Proposal 75 - Aerial Gunning Outside of Denali: OPPOSE. Studies have shown that Alaska's predator control programs- aimed at boostingmoose, caribou, and deer populations for hllllters - do not increase human moose hruvest.

Large carnivore management in Alaska is a reversion to outdated management concepts ai1d occurs without effective monitoring programs designed to scientifically evaluate impacts on predator populations or identify causal relationships between predator control and pre-population dynainics.

Proposal 11 - Sho1tened Brown Bear Seasons Near Katmai:SUPPORT

With the eai·ly season hunt, operators were still dropping off sp01t fishe1men ru1d wildlife viewers on rivers where bear hllllting was taking place. Hllllting camps ru1d hunters were occupying critical habitats where bears were fishing, forcing other users to avoid these areas.

Bears were shot right at the outlet of the Kulik River. The Kulik Lodge had employees breaking down camp, there were several groups of spo1t fishennen on the1iver as well as wildlife viewers. A beai· had cached a hunter-shot carcass right at the outlet of the Kulik River where aircraft picked up spo1t fishe1men and other visitors.

This proposal would restore the huntingseason to the pre-2022 length and would reduce human-wildlife conflicts

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PC74

Name: Della Dempsey

Community of Residence: Wasilla

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Suppo1t with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Della DempseyDATE:12/27/2024

I am w1iting in response to the recent proposals made by the Alaska Depattment of Fish and Game (ADFG). Many of these proposals would hatm Alaska's wildlife and disrnpt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These atlimals at·e worth fat· more alive than as trophies.

Encouraging overhunting may bring sho1t-te1m profits, but it risks long-te1m devastation. Overhm1ting key species-like brown beat·s, ca1ibou, and moose-will disrnpt the food web and make it harder for all at1itnals to survive. Tourists will stop coming if there at·e no animals to see, and ecosystems will snuggle to recover. Protecting wildlife is better for Alaska's environment and economy iI1the long nm.

Below, I have addressed each proposal in numerical order to explaiI1why they are lmsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hm1ters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Beat·s reproduce slowly-only eve1y 4 to 6 yeat·s-so overhm1ting could wipe them out. Protecting beat·s is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to ti·ick animals like this, and killing bears that are just tiying to smvive hat1ns the entire ecosystem.

0 PPOSE Proposal 3: Allow the use of cellulat· catneras for bear hm1ting over bait

Using lligh-tech cameras to lnmt bears gives hllllters an m1fair advantage and disrnpts wildlife by bringing too mat1y people into sensitive habitats. This kind of hllllti I1g is more about gadgets thanskill and puts too much pressure on beat·populations that at·e afready strnggling.

OPPOSE Proposal 4: Establish general season, at·che1y-only sheep hlmts

Sheep at·e an iinpo1tant pa1t of mollllltain ecosystems. Overhllllting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limitiI1g cat·ibou hm1ting seems like a good idea, it could make hllllters shift their focus to other aniinals, like bears or moose. Caribou can have babiesevery yeat·, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsiI1g

due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

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OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal

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Supp01t with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinaiy citizens would be walking. Remove, or increase the distance from the sides of the roads/lights of way.

In Conclusion:

Almost all of these proposals ha1m wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a funire where Alaska's wildlife can thrive.

Thank you for listening.

NAME Della Dempsey

[redacted]

PC75

Name: Andrea DeVore

Community of Residence: Anchorage

Comment:

I am submitting my comment in support of Proposal 82, Palmer Trapping Setbacks. I find this a ve1y reasonable proposal - 50 yards setback from trails would help trail users have less conflict and potential to have accidents. There will still be PLENTY of space for trappers that isn't quite so close to where the public recreates. Alaska is huge. There is space for the public to recreate on specific trails, and there is so much more space for trappers to keep on trapping. Keeping the two a little more separate is a logical step for the safety of all.

I am also submitting my comment in opposition of Proposal 75 Ae1ial Gunning outside of Denali. Snidies have long shown that predator control programsactually do not increase moose numbers. This is outdated. We can do better than shooting our unique wildlife from the air. Moose are no more valuable than bears and wolves, which visitors from outside travel to Alaska to see. Bringing their tourist dollars to our economy. It makes no sense to purposely kill wolvesand beai·s. They are pait of what makes Alaska so unique and1ich in biodiversity.

Name: Laraine Diaz
Community of Residence: Staten Island, NY

Written Responses to the proposals of the ADFG

OPPOSING!ALL!except

Support!with!amendment,!5,!6!7,!10,!18,!19,!20,!29,!65,!68,!69,!82!

NAME:!Laraine!Diaz

DATE:!December!2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species-like brown bears, caribou, and moose-will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly-only every 4 to 6 years-so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

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Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

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OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58-59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

Traps are inhumane and nonselective They injure and kill countless nontarget animals, including endangered and threatened species, even family pets. Traps often injured humans when attempting to release suffering trapped animals

OPPOSE Proposals 60-63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

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OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

Mrs. Laraine Diaz

[redacted]

PC77

Name: Amado Diaz

Community of Residence: Staten Island

Comment:

See attached

PC78

Name: John Dickens

Community of Residence: Colorad

Comment:

I am wiiting to express my strong opposition to Proposal 75 in Unit 16 which aims to reduce the populations of brown bears, black bears and wolves through aerial gunning. This proposal undennines the values of wildlife conse1vation. It also threatens the significant economic benefits derived from wildlife viewing in Alaska. Alaska attracts Inillions of visitors a year who come to see wildlife and generate about $2.5 billion annually for the state economy.

We need responsible conse1vation that protects wildlife and supports a healthy tomist economy.

For the same reasons I support Proposal 11.

John Dickens

PC79

Name: Bjorn Dible

Community of Residence: Juneau

Comment:

Regarding Proposal 75

I'm a lifelong Alaskan who has lumted and fished since I was a kid and trapped for a handful of seasons. I recognize wildlife management is complex and difficult. I commend biologists who are trying to do the best for Alaska's residents and wildlife. I suppo1t hunting and trapping of predators, but I oppose Proposal 75 for a number of reasons.

I have discussed predator control with numerous ADF&G and Fish and Wildlife biologists, many of whom are retired and freer to speak their minds. All questioned the effectiveness of predator control to achieve the goal of more adult ungulates for hm1ters. Many dowruight said they do not believe predator control works (to create more adult ungulates for human ha1vest). Some pointed to ae1ial wolf removal from Unit 20 as being one case where predator control did what it was supposed to do. While I was

writing an article for Alaska Magazine about IM in the Mukhatna Region, I asked ADF&G to put me in touch with biologists who believe it was a good idea and scientifically wananted. This never happened. Instead, I was given vague responses like some of the people who live in the area support the culling. There was no shortage of biologists that were against IM in Mukhatna that were willing to talk to me.

Predator control, especially the aerial culling of bears, is going to hwt the futme of lnmting of trapping more than help. Hunting and trapping are only going to become a more contentious public issue in the futme. To protect our heritage, we must be very careful about public relations with antihunters and antitrappers. Gunning bears down is probably the worst PR move I can imagine.

Using state money for predator control while public schools are being shut down and streets are going w1plowed is questionable at best. Other economic issues to be considered are how Proposal 75 might affect hunting guides and the wildlife viewing industry. Ifwe continue down the road of implementing aerial bear hw1ting, it's only a matter of time before there is some so1t of tourist ban that could deeply affect the state's economy.

I recognize there are food secmity issues for many people across the st.ate and that ADF&G is required by law to intervene in certain circumstances if deemed scientifically and socially appropriate. In regard to science, Proposal 75 appears at best to be on shaky grotmds. Socially it is even more questionable. Regarding food security, that's one reason why I'd love to see more regulations on tr·awling--even an entire ban of certain types. That would be one productive step to helping food security with a significant part of tl1e state. While the state aerial culling bears and wolves might seem like a solution to help mral people, it does not appear to be a reasonable tool to fixing the bigger problem.

Regarding Proposal 29

I agree str·ongly with this proposal. A new population assessment should include consideration of potential drivers other thanpredation, and consideration of the cunent

ecological state, rat.her than managing based on conditions from the past. Such an assessment is likely to conclude that predator removal is unnecessa1y and that human harvest of caribou can be re-implemented and sustained at some level.

I recognize that there is a lot of gray area in the sustained yield principle and managing wildlife population goals and it's defmitely a spooky time for much of our state's ungulate populations, but Proposal 75 is not the solution. Proposal 29 seems like a step in the right direction. Thanks for caring about the future of wildlife and people.

Bjorn Dible

PC80

Name: Crystal DiStaso

Community of Residence: Wasilla

Comment:

As an Alaska resident, I strongly oppose Proposal 75 because it would harm our wildlife and dismpt the natural balance of our ecosystems. I supp01t Proposals 11, 29 and 82 for their role in protecting bears, wolves and the safety of our public lands.

PC81

Name: Ann Dixon

Community of Residence: Homer, AK

Comment:

Hello,

I am opposed to Proposal 75 andshooting wolves from helicopters, especially in this area that is so close to Denali and Lake Clark National Parks.

I suppo1t Proposal 29, to review the population and haivest objectives for the Mukhatna Ca1ibou Herd.

Thank you.

PC82

Name: Cinnamon DOCKHAM

Community of Residence: Eagle River

Comment:

Prop 11, I suppo1t this proposal.

Prop 29 I oppose this proposal. Studies have shown that Alaska's predator control programs - aimed at boosting moose, cruibou, and deer populations is counte1productive, especially since other factors are associated with the lower caribou population

Large carnivore management in Alaska is a reversion to outdated management concepts and occurs without effective monitoring programs designed to scientifically evaluate impacts on predator populations or identify causal relationships between predator control and pre-population dynamics.

If approved, this proposal would give ADFG full reign to implement an aerial gunning plan in this Unit. Once a proposal like this is approved, ADFG has the authodty to develop an Operational Plan for aedal gunning that is not open to public c01mnent.

PC83

Name: Ben Dubbe

Community of Residence: Homer

Comment:

Proposal 3. I oppose this because this is a step in the wrong direction away from fair-chase and toward hunting with a computer.

Proposals 9,13,15,17. I oppose these because having resident opportunity is impo1tant. Our constitution says to manage for the benefit of the people (Alaskans). This is not defined as monetruy benefit. Money made from guiding or license fees should not be weighted any more than any other benefit.

Submitted by: Jessie Dunsie
Community of Residence: Fairbanks

Proposal 46

Strongly Support

I strongly support this proposal to eliminate the CSH for moose in Unit 13 and use a registration permit system instead.

The CSH system had good intentions when it was generated but has quickly become an abused system and a complex monster for ADF&G staff to try and manage. The majority of these "Communities" that make up the CSH structure live in Anchorage or the Mat-Su outside of unit 13. The below data from ADF&G's comments on the proposal make it clear how the local residents that actually live in & around unit 13, and who the original CSH system was intended for, are not actually getting the full advantage of the current permit structure:

"Over the past 5 years local residents in Unit 13 have harvested 21% of the total CSH harvest. Of the local Unit 13 resident harvest in the CSH hunt over the past 5 years, 52% of hunters used ATVs or ORVs for transportation and 2% of hunters used airplanes or boats. The remaining 46% of local harvest was achieved with highway vehicles for transportation, compared to only 16% of nonlocal harvest achieved with highway vehicle or otherwise nonmotorized transportation."

Only 21% of the moose harvest under the current CSH system was from residents of unit 13. That means 79% of the "Communities" that are benefiting from the CSH are actually comprised of hunters who live in urban cities, most likely Anchorage and the Mat-Su. Another interesting stat is that 84% of non-local "Community" members of the CSH system used ATVs/ORVs to harvest their moose compared to 52% of local users. The added non-motorized component of this proposal will likely result in less competition for local users and less bulls harvested during the early season dates and make better moose hunting for all user groups during the later general season.

If this proposal, or something similar to it, were to be passed by the board it would likely result in improved moose hunting opportunities for all user groups wanting to hunt unit 13 for moose. Unit 13 has some of the best road and off road trail system access in the state and it can be better managed and utilized then it currently is but not until the CSH system is revoked.

Proposal 50

Strongly Support

I submitted proposal 50 to eliminate drawing permit DS165 for resident hunters and convert it back to a general season area. My intent of the proposal was to also keep the non-resident hunt, DS265, implemented. DS265 would still be managed under the current strategy for the drawing permit and permit numbers will be decided on the number of full curl rams observed during a bi-annual survey that ADF&G conducts. The main purpose of this proposal is to alleviate some pressure from other general season areas around the state.

Justification:

Resident hunters have seen vast chunks of sheep hunting area either shut down to hunting altogether or severely limited by converting areas to drawing permits. An example of just how real things have gotten, in summer 2024 ADF&G shut down the Glacier Mountain CUA due to low ram numbers, going against their status quo of full curl management being self-regulating. Add that closure to the park service shunting down the remainder of Yukon Charley preserve and a good portion of the Brooks range accessible from the road, and reasonable options for hunters are getting slim. Drawing permits are good in some circumstances but numbers fluctuate on a regular basis and are based on number of legal rams observed during surveys. Due to declining sheep numbers in recent years, permit numbers have been extremely low. Low permit numbers puts additional hunting pressure on open general season areas, even with overall sheep hunter numbers declining. The accessible areas for sheep hunters to spread out is rapidly thinning.

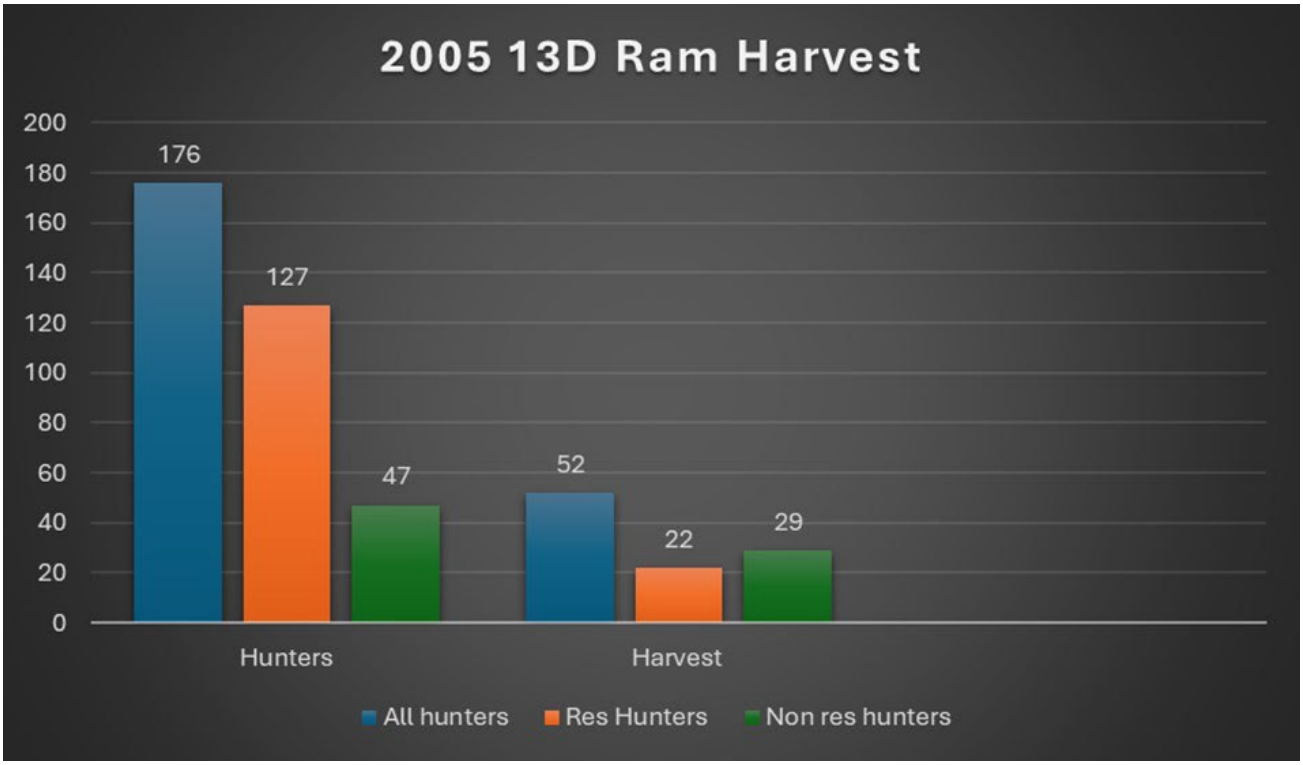
Numbers: *The following numbers came from data available from the ADF&G website.*

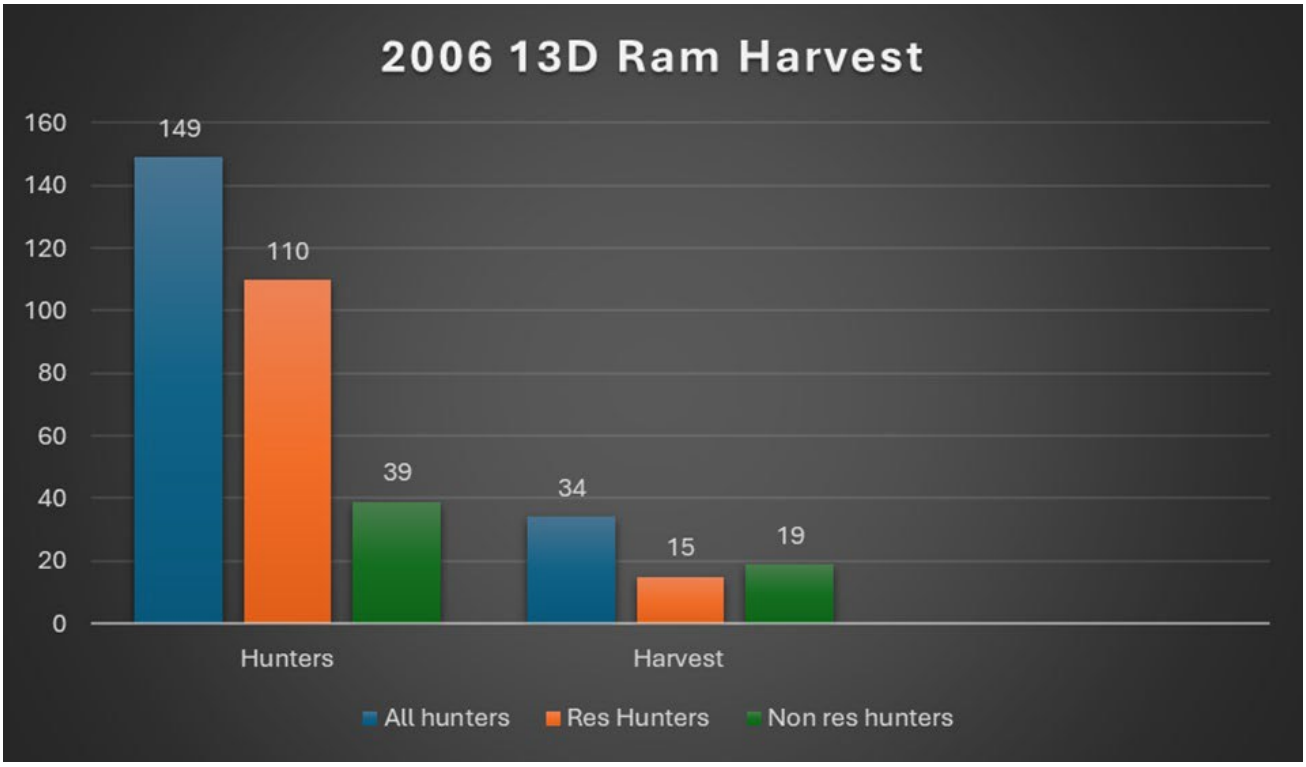
ADF&G has repeatedly stated that due to the full curl management strategy being very conservative, overharvest of rams is not a concern. In the comments from the department on proposal 50 it is stated that an increase in hunter numbers is likely to the former DS165 hunt area and overcrowding could be an issue. Although hunter numbers will likely increase, it is my belief that overcrowding will not be an issue due to a couple factors. One factor being the overall number of resident sheep hunters in the present time being a fraction of what it was prior to DS165 area being converted to a draw tag in 2008. In 2006 there were 2,134 resident sheep hunters statewide and 110 hunted unit 13D, which is about 5%. In 2022 there was a total of 1,470 resident sheep hunters statewide, and if we

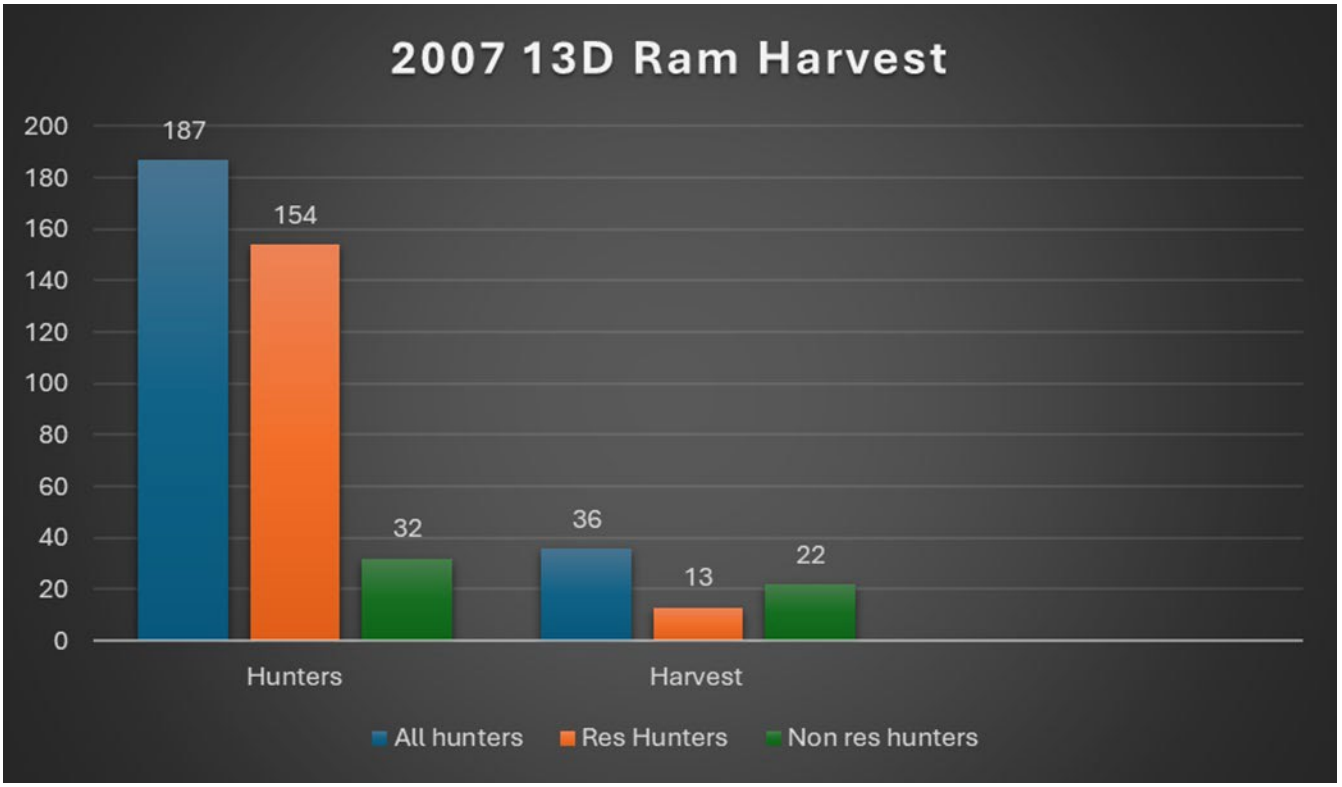
stick with the 5% figure from 2006 that is only 73 resident hunters for the former DS165 hunt area. Another factor likely to keep overcrowding down if DS165 were eliminated, is the access to the area. There is essentially no road access to hike into this area. The primary means to access the area is by airplane and transporters for the area are limited and can only take so many hunters.

Conclusion:

The effect of converting DS165 back to a general season area and alleviating pressure on other open areas is likely to be minimal. Hunters are not going to flood the area just because they can. Hunters know that legal ram numbers are low in this area. However small the number of hunters this pulls from other areas around the state, it is a step in the right direction to creating more reliable sheep hunting opportunities for resident hunters. ADF&G is also starting to consider small but impactful changes to sheep hunting regulations, this is demonstrated in the closure of the Glacier Mountain CUA. Keeping the non-resident hunt a draw will result in more full curl rams being available to harvest due to the overall success rate of guided hunters being very high. More legal rams available in the area will add to the hunt aesthetics for resident hunters. The attached graphs with this comment illustrate that although more resident hunters utilized 13D prior to 2008, non-residents still harvested more rams.


2005 13D Ram Harvest
200
180
160
140
120
100
80
60
40
20
0
176
127
47
52
22
29
Hunters
Harvest
All hunters
Res Hunters
Non res hunters


2006 13D Ram Harvest
160
140
120
100
80
60
40
20
0
149
110
39
34
15
19
Hunters
Harvest
All hunters
Res Hunters
Non res hunters


2007 13D Ram Harvest
200
180
160
140
120
100
80
60
40
20
0
187
154
32
36
13
22
Hunters
Harvest
All hunters
Res Hunters
Non res hunters

PC85

Name: Chris Eckel

Community of Residence: Juneau

Comment:

Proposals 75, 76 & 78 Gmu 16 aelial predator control to help moose population:

I am opposed to these proposals. The science clearly shows that healthy predator populations create healthy game populations better able to withstand disease and environmental factors. (For example see Efficacy of Killing Large Carnivores to Enhance Moose Harvests: New hlsights from a Long-Te1m View

by Sterling D. Miller, David K. Person, and R. TeITy Bowyer) Even if a predator control program was deemed necessary many Alaska residents would be interested in a wolf hlmt, and the need for ariel culling of animals is best left to Texas.

Proposal 34: Seeks to allow same day airborne take of brown bears for resident hunters in GMU 17 from August 20 - May 31:

I am opposed to this proposal. Alaska has long maintained a prohibition on the taking of big game same-day airborne to comply with long established fair chase p1inciples. Limited exceptions have been approved by the board, nonnally associated with directed and pennitted predator control programs and more recently, for species typically ha1vested over a stationa1y bait site (black bear) during time pe1iods separate from the general fall hunting seasons. Allowing same-day airborne harvest of brown bears, particularly during fall general hunting seasons, will make enforcement of all other same-day airborne prohibitions effectively impossible.

Proposal 33:

I am opposed to this proposal. See reasoning for Proposal 34

Proposal 76: Seeks to allow the take of brown bear in Unit 16 the same day airborne from October 1 - August 9, provided a hunter is at least 300 feet from the aircraft:

I am opposed to this proposal. Same day airborne ha1vest is already pe1mitted for both black and brown bears in GMU 16 at a registered bait site. Hunting of brown bears during the dates in this proposal, outside of registered bait sites almost entirely occurs in the spring when bears are leaving the den. Aside from completely throwing"fair chase" out the window, allowing harvest of brown bears would undoubtedly lead to dozens if not hlmdreds of Anchorage and Mat-Su area pilots stalking brown bears from the air dming the months of Aplil May. Without a snowmachine ah'eady staged in the area, the only effective means to ha1vest a bear lmder tl1is proposal is landing ve1y near a bear andshooting the animal before it depa1ts the area. Same Day Airborne as pa1t ofhltensive Management typically includes a process for vetting pilots and their abilities p1ior to being pe1mitted. This proposal would remove that safety filter and allow anyone with a plane and license to t:Iy their hand at land and shoot bear hlmting.

Proposal 58 Decrease the minimum wolf population to 100 in Unit 13 in the hltensive Management Plan:

I am opposed to this proposal. The science clearly shows that healthy predator populations create healthy game populations better able to witl1stand disease and environmental factors. (For example see Efficacy of Killing Large Carnivores to Enl1ance Moose Haivests: New hlsights from a Long-Te1m View

by Sterling D. Miller, David K. Person, and R. Teny Bowyer)

PC86

Name: Ira Edwards

Community of Residence: Palmer

Comment:

I suppo1t proposal #3. bear baiting is ah'eady time and labor intensive. in areas designated for increased lnmting opportunities for bears, this make the opportunity to ha1vest matme bears more efficient and reduce the predation on other game animals like moose. Personally, I am paralyzed and in a wheelchair. ANY tiip into the field is a major effort for me and this regulation change would allow me a greater chance of success in helping to control bear populations in these areas.

PC87

Name: Kolton Eischens

Community of Residence: Wasilla

Comment:

4: Sti·ongly oppose to add more sti·ess and more hunting oppourtunity on an animal that is declining statewide.

50: I support but with the changes of: Make this area HT for residents and make it draw for NR (with help from ADFG to detennine that number). Also attach half of this to the TONSINA CONTROLLED USE AREA for non moto1ized Controlled Use Area. I think a great bolmda1y would be eve1ything East of the Klutina River from Copper Center to the little 1iver that forks off to the EAST (SE fork Klutina River) before the toe of the Klutina Glacier all the way to the Tonsina glacier to be in a controlled use area. (I will attach photos). By making this the boundary this would still allow float plane acess on Klutina Lake, jet boat acess on the Klutina1iver, and plane acess on the SE FK Klutina River bar, the Klutina Rlver snip by the glacier and down by the lake. Approximently this would be a 30x25 miles of sheep habitat that would be non motorized. My reason for changing this area would be to continue the area for ti·ophy potential and limit access to moto1ized vehciles and allow people using the road system more area to hunt without the overhead pressure of planes, and other motoiized vehciles. Essentially this would leave the West half of DS165 to be used by moto1ized vehciles and t11e east side to join the TCUA. As technology and transpo1tation means get better and better this is a great way to limit some of that for the boots on the ground go getter hunter.I would also like to implement a ve1y low or no number of NR tags for this controlled use area. Cl.llTently for all of DS165 there is 14 NR guided tags and 1 Nomesident next of kin tag. I am thinking that the conti·olled use area po1tion of this could have 4 nonredisent guided and 1 next of kin guided tags for Aug26-September20(please allow the first 16 days of the season to resident only) similar to the other Chugach draw tags. I know there is a lot of ideas in this ammendment, I have consulted with multiple ADFG biologsits who sti·ongly supp01t this idea of the cont1tolled used area. Like I said, I strongly hope this is taken into consideration, as t11ere is becomming less and less areas gor us road style hunters to have to foot acess only. Feel free to call me with any questions or email me.
[redacted] - SEE ATTATCHED MAP

One other idea is maybe making it non moto1ized just for harvest of sheep and goats. Allowing moose and bear hunters to acess for hunting with mot.01ized means. This could get dicey as it coul dbe hard to prove if one is sheep hunting or moose hunting. In my photo I will have a "no1them" bounda1y so the locals of copper center area could use morotized for moose hunting. I think there is a way to make 99% of users happy.

There has been many other fellow hunters I have brought this up to who strongly agree with my idea. Thanks for your time.

51: Strongly agree to increase areas residents can go without the pressure of guides.

PC88

Name: Holly Ellis

Community of Residence: Helle1town, PA

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Supp01t with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Holly Ellis DATE:12/27/24

I am wiiting in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would ha1m Alaska's wildlife and disrnpt the namral balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring sh01t-te1m profits, but it risks long-te1m devastation. Overhunting key species-like brown bears, ca1ibou, and moose-will disrnpt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will st:mggle to recover. Protecting wildlife is better for Alaska's enviromnent and economy in the long nm.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal I: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly-only eve1y 4 to 6 years-so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or nanual to trick animals like this, and killing bears that are just tiying to swvive haims the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellulai· cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature’s balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60-63: Changes to ptamligan hunting

Ptannigan are food for many predators, including bears. Overhunting them would dismpt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the cunent levels is bad enough, introducing NEW hunting seasons and handing out more pe1mits will only make the situation worse.

Supp01t with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of pe1mit.s, lower the bag liinit, and sho1ten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any ailimal killed as a major food source for themselves and their fainilies. Trophy hllllting is a disgraceful waste of a ve1y liinited nan1ral resource, one which cai1save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This ha1ms the balance of the ecosystem and makes it harder for all ailimals to smvive.

Supp01t with Amendment 82: There should be NO traps anywhere where cllildren, dogs, or ordinaiy citizens would be walking. Remove, or increase the distance from the sides of the roads/lights of way.

In Conclusion:

Almost all of these proposals ha1m wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a fun1re where Alaska's wildlife can thrive.

Thank you for listening.

Holly Ellis

[redacted]

PC89

Name: Melony Elsayed

Community of Residence: USA

Comment:

Supp01t 5,6,7,10,18,20,29,65,68,69,82

Oppose all others

PC90

Name: Sudan Emmons

Community of Residence: Eagle River

Comment:

PROPOSAL82

5 AAC 92.550. Areas closed to trapping.

The moose range and other areas in Hatcher pass where people hike

With dogs and children need to be closed to trapping

PC91

Name: mare engel

Community of Residence: I live in FL at this time

Comment:

I oppose the following proposals 33, 59, and 75

I strongly oppose aerial hunting As a life long hunter this is not hunting but killing and literally the most haimful way to manage and the most destrnctive with respect to ecosystems I oppose the lengthening of the seasons proposed

Historically wolves and other predators including bears have been killed by "managed" hllllts based on naive historical practices not science The Creator gave us the responsibility to cai·etake his Creation not destroy it especially out of our own ignorances driven by fear and greed

I hllllt for meat I take only what me and my family need as the Creator intended

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PC92

Name: Susan Entsminger

Community of Residence: Mentasta

Comment:

Proposal #51 & #52 regarding resident only around Maccoll Ridge & the Chitna River

I have se1ved on the Game Board 1993-96. I commend all of you board members for your commitment to se1ve. thank you! I have always been a resident of Alaska first & guide second. The guiding indusl1y is a way of life for many like me inrnral Alaska as a way of life & income. I raise my son in rnral Alaska. I took him commercial fishing beginning age 13. This was a season job to help for income in rnral Alaska. I later helped him become an assistant guide so he could continue living where he grew up. He sta1ted with Ultima Tuile by Maccoll Ridge on the Chitna River. I later worked for the Claus family guiding hunters. I have grown to respect guides since I too found income to smvive where I live. If the Board of Game passed these 2 proposals under the pretense that no guiding be allowed neai·a lodge, over have the

state of Alaska would be close to guiding. there would not be much left for opporttmity for non-resident hllllting. this is a ve1y selfish proposal. Residents need to pay up if they want hllllting all to themselves. Where is the proponent suggestion how to pay for game management since non-resident pay over 70% now. I am ve1y wholehea1tedly opposed to both these proposals due the ramifications of shutting down an industry and ftmding for Fish & Game Depaitment. Thank you for heai·ing my testimony.

proposal #59&61 Amend to parallel GMU12

proposal #63 Amend to a different system like a required repo1ting

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PC93

Name: April Erb

Community of Residence: Bennington, Kansas USA

Comment:

See attached

PC94

Name: Shannon Etickson

Community of Residence: Anchorage

Comment:

"As an Alaska resident, I strongly oppose Proposal 75 because it would harm our wildlife and disrnpt the natt1ral balance of our ecosystems. I supp01t Proposals 29, 11 and 82 for their role in protecting bears, wolves ai1d the safety of our public lands."

PC95

Name: Kacee Evans

Community of Residence: Texas

Comment:

OPPOSE Proposal 75

SUPPORT Proposals 82, 11, 29

PC96

Name: Anne Falcon

Community of Residence: New York, NY

Comment:

Dear Members of the Centrnl & Southwest Region's Board of Game,

I am wiiting to oppose:

- Proposal 58: Reduce the minimum wolf population in the Unit 13 Intensive Management Plan for wolves.

- Proposal 75: Add Depa1tment removal of wolves, brown bears, and black bears to the Unit 16 Intensive Management Plan.

1. Increased Trapping Seasons May Be Enough

Extending the wolf trapping season could already help manage wolf numbers. Additional measures, like lowe1ing mini.mum population thresholds or Depaitment-led removals, may be excessive and risk long-te1m ecological ha1m.

2. 2021 Wisconsin Overhaivest Incident

In Febrna1y 2021, Wisconsin's first wolf hunt in six years was closed eai·ly after hunters killed more than 80% of the allowed quota in just 3 days. The result was a 14% drop in the Wisconsin wolf population, and lawsuits filed by Ojibwe tribes and wolf advocates. This cautionaiy example underscores how quickly overha1vest can occur, causing unintended consequences for wildlife and public perception.

Wolves ai·e integral to healthy ecosystems, and I urge the Board to protect sustainable populations. Please reject Proposal 58 and Proposal 75 and instead rely on responsible management strategies like longer trapping seasons and robust monitoring and enforcement practices.

Thank you for considering my comments.

PC97

Name:rebecca Falk

Community of Residence: united states

Comment:

I am ve1y distraught that Alaska wildlife is even considering targeting wolves and bears. i STRONGELY OPPOSE SHOOITING WOLVES AND BEARS BY AIRPLANE, SNOW MOBILES AND SHOOTING THEM ON LAND. These animals biing in a lot of tourists to see them. Which b1ings in a lot of money to the state of Alaska. Just 10 years ago you had a 40 percent chance to see wolves in Denali. Where tomists pay a lot of money to see them alive. Now it is very rare to see wolves. Wolves and beai·s should be protected by the pai·k not shot down. I am planning on visiting the Denali area. Where I want to see packs of wolvesand bears. If you reduce these animals it will be a disaster and it is ve1y crnel that shooting them by aiiplanes is even being considered.

These predators are a pa1t of Alaska and should be protected. Shooting is cmel and it will also off set the balance of nature.

Strongly oppose Number 75 and 78.

PC98

Name: Susan Fanning

Community of Residence: Toms River, NJ

Comment:

Alaska Board of Game Proposals Unfairly Target Wolves.

The Alaska Board of Game will discussa vruiety of proposals. These proposals blatantly disregru·d fair chase and ethics, inconectly blame wolves for decline in cru·ibou populations, and seek to liberalize both killing seasons and the methods people can use to kill wolves.

Same day airborne killing violates fair chase metl1ods and gives lnmtersan unfair advantage over their target species.

Proposal 59 asks for a longer wolf trapping season in Unit 11. The cmTent season rnns from November 10 - March 31, but the proposal asks for a new season extending from October 15 - April 30 in order to give people more time to kill more wolves. Traps are inhumane and inherently nonselective. They injure and kill countless nontru·get animals annually, including endangered and threatened species and even family pets. Traps often injure people too when attempting to release a trapped animal. In their comments, ADFG acknowledges that extending the trapping season posesa risk to non-target species but they suppo1t the proposal despite these risks. THIS IS VERY WRONG. Why ru·e the wolves so hated. It really makes no sense to me. Ve1y non caring and zero compassion for wildlife!!

Proposal 75 seeks to add ADFG removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan. This would alllow allow depa1tment employees to conduct aerial, land and shoot, or ground-based killing of wolves and black bears and brown bears using state-owned, privately-owned, or chattered equipment, including helicopters, under AS 16.05.783. The state wants to decrease the wolf population in this area to 35-55 wolves and claim tl1at 100 wolves must be killed annually, for several yeai·s, in order to reach this minimum. ADFG claims that there's low interest from hm1ters because a majo1ity of the wolves in Unit 16 have lice (which results in poor pelt quality) ai1d low interest from pilots because they can pa1ticipate in same day airborne hunting in other m1its.Therefore, ADFG argues that they may need to kill wolves because there's declining interest from the general public. THIS ABSOLUTELY MAKES NO SENSE AT ALL!!! NO ONE OTHER THAN RANCHERS OR PAID HUNTERS want wolves killed this way!!!

Proposal 79 requests an extension of the wolf trapping season by one month to April 30 in Unit 14A, to give trappers more time to kill wolves and to align the trapping season with neighboring units. In their comments, ADFG acknowledges that extending the trapping season poses a risk to non-target species but they support the proposal despite these risks. THERE SHOULD BE NO EXTENSION OF THE KILLING SEASON!!

Killing Wolves is Unnecessaiy

The concept that state-sanctioned killing of wolves is necessaiy to control wolf populations is one of the most widespread assumptions in lai·ge carnivore management but reseai·ch demonstrates that wolves limit their own numbers. Wolves don't decimate wild ungulate populations and they don't pose threats to human safety. So why does Alaska continue to get away with outdated and inconect management practices??????

IT SEEMS LIKE THE ALASKA BOARD OF GAME JUST WANT TO KILL WOLVES FOR NO RELEVANT REASON because none of these proposals make any sense!!!!! PLEASE LEAVE THE WOLVES ALONE!!

PC99

Name: Gabliel Finley

Community of Residence: California

Comment:

To the Boai·d of Game,

I appreciate your attention. My personal and professional recommendation from an ecologist's perspective will be succinct.

I have reviewed the proposals put fotth, and I felt a necessity to oppose some of them.

Most notably, I oppose Prop 75. This is an excessive cull, and I am not alone in believing such. While I believe in active management plans and solutions, I also understai1d population dynamics, predator-prey dynamics, and social dynamicsamong predators.

In a more personal note, I add this: Your state is our nation's greatest remaining safe haven for predators such as the brown beai·, grey wolves, and wolverines. It's critical to protect these thriving populations, especially when they contribute such substai1tial ecological value and appeal for ecotomism

I am also inclined to oppose Proposal 76, Proposal 77, and Proposal 78. I encourage you to reconsider these.

I hope that you also take extreme caution when considering Proposal 32, Proposal 33, Proposal 38, Proposal 57, and Proposal 58. Consider the life histo1y and behaviors of the species affected, and consult your colleagues with an understai1dingof population dynamics to ensure sustainable populations for the speciesaffected.

Thank you for your time. Please respect our nation's natural treasures.

Gabriel Finley

PC100

Name: Shane Foord

Community of Residence: Willow

Comment:

Proposal 70

I support this proposal.

This proposal would be great for continued predator control. With our ungulate population seemingly declining it would be a benefit to allow hunting beyond the current season. As someone who travels this area remotely it seems that the bears have been showing up later in the season due to possibly heavier snowfall the last few years.

Proposal 3

I support this proposal.

This proposal really wouldn't change what's currently happening now. The lack of enforcement allows this to happen. If law enforcement would boat from Talkeetna to Willow there are bait stations left out all year, cellular trail cams left out, stands left, remnants of camps on almost every single island from talkeetna down stream on the Susitna.

Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708

ATTN: BOG COMMENTS

12/lf,/24

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

Dear Chairman a1,d mernbers of the Board:

On behalf of over 1100 members of the Alaska Trappers Association, we wish to share our opinions on a number of proposals you will be considering at your January Central and Southwest Region meeting in Wasilla.

PROPOSALS #19 and #20

These proposals look like a solutio.nlooki g fora problem. Wh.ile the supporting data seems to show population fluctuat(on rather.tha_n d cline and, while such a.regu!atJ9nould increase the C0[.111?.lexity of the trappingregulations,we defer to:thejudgement of the_Board..W. just _don't s_ee a.dem9n trate,d biological need..

PROPOSAL #21

Vl(hile we are not categorically opposed to harvest of furbearers by means of firearms, it is ATA's long standing published position that trapping should remain the primary m ans for harvest of furbear rs (_ ee.attacl:)ed): _We al.so note the slgnificarit pote:ntial for !oss when taklr,ig_beaver.by fir-earm but d_efer t_Qth.e)u,dgern i:itoHh o. rd rggard,ing t_hisprqpo_s?I.,

PROPOSALS#22, #35 and #36

These three proposals relate closely with each other geographically and functionally. Consideration of the three c_ould be simultaneous.

ATA sees.n() need to ihange the losing date for wo.lverioe in Uni(l?..rhe-cu.rrent Mar 31 closing is. consistent with the closing date in u'nits 18 and 19.to the no.rth and with Unit 9B to th·e south, and local membership reports that wolverine are plentifuL

PROPOSAL #37

A ·wit .Proposal #21, it is the position of ATA-that trapping should be the primary means of harvesting furbearers and that hunting beavers presents a significant potential for loss-. At the same time, local rriembership tells us that be lVer are plentiful. We wili'defer to the judgemen t of.the Bo.ard !'.:> n this_ proposal.

PRci'POSAL #59

_ATAJs opposed to the earlier opening for wolf trapping. The regular trapping season opens November 1Q., Opening the.wolf season.ea_rl.i_er would .create the potentialfor_npn:target cat.ch of other f rbearers before the s ason is open for those species.·It would also re ult In the harv t of wolf pelts tha.t are less prime..Itmakes more sense to retain a single date for the opening of the general trapping season.

While we are concerned about the tendency to extend closing dates into the reproductive denning season, we will defer to the judgement of the Board regarding the proposed April 30 closing date since it would align Unit 11 with adjacent units.

PROPOSAL #60

ATA opposes this proposal for the same reasons as we oppose Proposal #59. It would create a potential for taking non-target species, would result in the harvest of less prime fur and would muddle the opening of the currently consistent general trapping season.

PROPOSAL #79

ATA is not opposed to this proposal since it would serve to standardize the season closing date with adjacent units.

PROPOSAL# 80

ATA supports this proposal as it may help analyze the recent decline in beaver populations in Unit 16. The sealing requirement could be eliminated when the beaver population recovers.

PROPOSAL #81

This is essentially a perennial proposal to which we remain steadfastly opposed. It's arbitrary, unnecessary, anti-trapping, and would be impossible to enforce. It totally ignores conibear trapping, drowning sets, etc. Also, it would force the dangerous situation of having to check traps during weather events when nobody should be on the roads or in the woods.

PROPOSAL #82

Since this proposal is consistent with ATA's Trapper Education Program, our published Code of Ethics, and a long-standing position statement (see attached), we have no objection to it. We expect that such a regulation will be difficult to formulate as well as difficult to enforce but, as long as it alleviates the problem of loose dog entrapment, it can be a good thing. At the same time, we understand the potential for such regulation to slide down a slippery slope. We have worked with the Alaska Wildlife Alliance as they developed this proposal. It is likely that we will work with them in the future but, as soon as it appears that such proposals are simply anti-trapping, we will be the first and loudest to oppose them.

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

Sincerely,

Randall L. Zarnke, president

Alaska Trappers Association
Official Position Statement
Firearm Harvest of Furbearers

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

Adopted this 28th day of April, 2015

_____

ATA president

Alaska Trappers Association
Official Position Statement
Avoiding Conflict with Trail Users

The Alaska Trappers Association actively promotes ethical trapping and avoiding conflicts with other trail users. These principles are embodied in our Code of Ethics and have been incorporated into our training programs for decades.

Clarity of our position may be enhanced by providing more specific guidelines. We her by recommend that trappers exercise caution when trapping near areas of high public use such as trail-heads, rest areas or turn-outs. To reduce the potential for conflict with other outdoor enthusiasts, we recommend that traps and snares set within 150 feet of high public use areas and trails be limited to:

- Under ice,
- Submerged,
- Enclosed (four inch opening or less), or
- Elevated (four feet above ground or snow level).

Trappers should exercise caution when using "call" lures or bait near high public use areas and trails. These scents can attract dogs from distances well beyond 150 feet and can lead to conflict with local residents.

In summary, it is ultimately the individual trapper's responsibility to ensure the reduction of conflicts with other trail users. We hope that other trail users will extend that courtesy to trappers in return.

The primary cause of conflicts between trappers and other trail users is loose-running dogs. The level of public opposition to loose dogs is large and growing. We encourage local governments to adopt and enforce leash laws to stem this problem.

Approved this 24th day of November, 2020

Randall L. Zarnke

ATA President

PC102

Name: Paul Forward

Community of Residence: Girdwood

Comment:

The theme of my comments strongly the support the following two tenants:

maintaining true fair chase hunting ethics

Utilizing archery hunts/seasons/areas as a conservation tool that increases opportunity while decreasing harvest impact

Proposal 3 - OPPOSE

- utilizing game cameras over bait stations is anathema to fair chase hunting ethics. This proposal should not pass.

Proposal 4 -SUPPORT

-I strongly encourage the BOG to fully read and consider the case made in this proposal for an archery sheep season. This 4 day season would have no affect on the current youth season, nor would it have an legitimate affect on the current open season that starts 8/10. The only downside is that, under current law, it would be legal to aerial scout during this season but there is a statewide proposal that would shift the aerial scouting back to before 8/1 to close the current loop hole that already allows it during the youth season. (Anathema to fair chase hunting and a poor example to set for young, impressionable hunters.)

One point that is not made in the proposal itself is that this season would likely shift many current sheep hunters toward archery hunting. Based on my experience with the sheep hunting community I believe the hunters that would swap over to archery equipment would likely be more experience and skilled hunters and many of them would stay afield with their archery equipment as the general season begins. I believe this would decrease the overall hunter impact on the legal ram population which will increase the quality of the hunting area for all and, if ongoing research bears this out, may also decrease the negative impact that even full curl management seasons can have on the sheep population.

Based on current harvest statistics showing very low success rates even in "any ram", easily accessible archery hunting areas, this 4 day season would have very close to zero impact on sheep populations and hunting but would provide increased opportunity for hunters as well as spreading out the hunting pressure over a slightly longer period.

After 100 plus days of active archery hunting for sheep I am also confident that any claim that an archery season would "push sheep" into other areas is both false and (I have never had difficulty relocating spooked rams in multiple parts of the state) and also largely based on hunters who fear that sheep they scout from the air during the pre-season will have been moved. Aerial locating of sheep prior to the season may currently be legal but is far from ethical and the opposite of fair chase.

Compared to Canada and the lower 48 Alaska has very few dedicated archery seasons or areas despite increasing interest from resident and non-resident hunters. Archery seasons have proven to be effective tools that increase participation and opportunity without detriment to the population.

Finally, in the past sheep season proposals have been met with opposition, primarily in two forms. The first is that archery seasons aren't necessary because there is plenty of country to hunt in and those

hunting with a bow shouldn't have trouble finding their own area away from rifle hunters. Ie, it's unnecessary because there is so much country that hunters aren't impacting each other. The second point, often made by the same people voicing the first, is that an early archery season would create pressure on rams causing them to move to other areas (or go places that they weren't when they were scouted from the air the week before) making it harder on rifle hunters who follow them.

These two arguments are clearly in opposition to each other. The reality is that even the most remote corners of sheep country often attract multiple groups each season. I have personally hunted areas that far from the road and difficult to access and still run into other hunters about every other year or more. I hear the same from hunters throughout the state and has ram populations continue to dwindle, it's likely that there will be even more user conflict. I have already addressed the point about scaring sheep into other areas and am convinced that any skilled hunter should be able to relocate a ram that has been spooked. They rarely go more than a few miles and ofter much less.

It's okay for sheep hunting to be challenging and, in a era of online information, ultralight gear, long range shooting and plethora of super capable airpplanes, it's time for the state to consider ways to make sheep hunting challenging again. If there is concern that sheep cannot withstand even more hunting pressure from this proposal I would suggest just making the archery-only season August 10-20 which would likely create a big decrease in harvest without any loss of hunting opportunity. (After all, anyone who buys a bow can pretty quickly become a "bowhunter" and partake in such an opportunity.)

Proposal 45- SUPPORT

-this proposal improves opportunity with minimal detriment to game populations.

Proposal 47-SUPPORT

-as with all archery hunts this would provide much appreciated hunting opportunity with minimal impact on harvest.

Proposal 53- SUPPORT- archery sheep hunts are a perfect tool to maintain or increase hunter opportunity (essentially any sheep hunter can quickly learn to shoot a bow) while dramatically decreasing harvest impact. Aerial scouting should not be allowed during this period (statewide proposals to this affect)

Proposal 56-SUPPORT-an archery only goat hunt is a perfect management tool to increase hunter opportunity while having little to no affect on goat populations

Proposal 65-SUPPORT-I have extensive experience in this area and agree that the current number of tags seems to have overshot (figuratively and literally) the resident moose population.

Proposal 66- SUPPORT- this is another example of archery seasons that increase opportunity while having only a small affect on the moose population. I can also speak from personal experience that hunting with a bow in these units during the regular season can be hazardous when there are hunters around taking quick shots at moose in thick vegetation with rifles. A bow season would help spread out the user groups and allow for a more quality and safe experience for all. Despite being in the rut, moose in 14A and 14B are very wary during late September and it's unlikely that this season would have a significant adverse impact on moose populations.

Further, we are increasingly have late autumn with temps so warm in much of September that moose hunting has become borderline irresponsible during the early part of the month due to temps that make meat care much more precarious. Allowing for a later hunt would provide better conditions for optimal meat care.

Proposal 67- SUPPORT-for the same reasons listed above

Proposal 74- SUPPORT-as above, Alaska has extremely limited archery hunting areas and seasons and almost zero for sheep. This would provide opportunity without adversely affecting the population.

PC103

Name: Charles Fowler

Community of Residence: Woodinville, WA

Comment:

Comments by Charles W. Fowler:

It is clear to me that the management of human impacts on wildlife and their ecosystems are of extreme importance. And one-size does not fit all. Management needs to be tailored to the specific area of concern, taking into account the history and circumstances of each individual area. This is particularly important in regard to an identified subspecies specific to a particular area as is the case for the Pribilof fox. Proposals 19 and 20 acknowledge the importance of recognizing humans as a predator and do not recommend a bag lime of zero or a season length of zero. These matters have been coordinated with local residents. As someone with over 20 years of wildlife research on the Pribilof Islands, I emphatically support both proposal 19 and proposal 20.

PC104

Name: Kevin Fraley

Community of Residence: Fairbanks

Comment:

I am a resident Alaskan hunter and have periodically held a trapping license in the state. I am commenting in support of Dr. White's proposals to establish nonresident hunting and trapping bag limits for endemic Arctic foxes on the Pribilof Islands, which are currently lumped together with non-native red foxes in the regulations for GMU 10. I was able to attend a presentation Dr. White gave in Fairbanks about her long term research on these Arctic foxes, and she made a compelling case for their value as a unique subspecies of Arctic fox and vulnerability to overharvest. Dr. White's long tenure researching and working with the people of the Pribilofs, as evidenced by the support she has received from a local community group, shows her commitment to conserving these special foxes while not limiting the harvest of locals or other Alaskan residents in any way. I support both proposals, which are needed to be approved together, because use of firearms is often a means of take in trapping regulations and implementation of one proposal but not the other would render the effort ineffective.
19, 20

PC105

Name: Tyler FReel

Community of Residence: Fairbanks

Comment:

I wish to comment in support of Proposal #3, which would allow the use of cellular cameras on bear bait stations. Having used them before the board decided to not allow their use, I can confidently state that they do not provide an unethical or unfair advantage to the hunter. It can certainly help save a hunter time and fuel, but provides no more advantage than being able to use an airplane or boat to bait bears. In fact, folding wireless trail cameras under the same rules as other wireless communication would clean up the unintended effects of the code as written...where a cell phone is technically a sensory device that can send information and a hunter who manually downloads photos from a trail camera in person at the bait site, then sends a photo or message to his hunting partner is violating this regulation, regardless of whether the bear is hunted after 3am the following day. The notion that hunters will be waiting to travel to their baits and kill a bear as soon as they receive a photo is highly unrealistic. Also, these cameras can be programmed to transmit all images one time per day, so compliance with a next-day-type regulation is feasible.

PC106

Name: Melissa Freels

Community of Residence: Gladstone, Oregon

Comment:

Comments to the Alaska Board of Game regarding proposals to be discussed at the Central & Southwest Region Meeting, (scheduled for January 10- 17, 2025)

Submitted by Melissa Freels, mdfpdx@msn.com

Proposal 2:

OPPOSE – This would broadly expand bear baiting and would result in more brown and black bears being killed in these units. In some areas mentioned in this proposal (Units 17, 18, and 19), intensive management through the killing of bears is already underway by ADFG. Bear population data has not been provided to demonstrate a need for this broad-sweeping change or show the impact it will have on the bear population. In addition, the proposed changes increase the potential for more human-bear interaction and conflicts in certain units.

Proposal 3:

OPPOSE – If approved, this proposal would allow bear baiters to use wireless game cameras to monitor activity at bait stations. This is unethical and violates fair chase, giving hunters an unfair advantage.

Proposal 5:

SUPPORT – With concerns about declining numbers of caribou in other units, it makes sense to take a conservative approach here and limit the nonresident hunt, especially given that this unit was closed until just eight years ago due to low numbers of caribou.

Proposal 6:

SUPPORT – With concerns about declining numbers of caribou in other units, shortening the length of the nonresident season is the sensible move, especially given that this unit was closed until just eight years ago due to low numbers of caribou. Beginning the season in September rather than August will also help reduce harvest waste, as it is difficult to in August to prevent the heat and bugs from spoiling meat, hide and antlers.

Proposal 10:

SUPPORT – Closing bear hunting to nonresident hunters will reduce the pressure being placed on the brown bear population in the small portion of Unit 9A where hunting is allowed. Data shows that between 2011 and 2017, the number of bear kills significantly increased in this small area of Unit 9A, yet that number decreased in Unit 9 as a whole. Limiting the hunt to residents will give the area's bear population some much-needed "breathing room." It will also help ensure that this area meets the requirement of "high concentrations of brown/grizzly bears" as set forth in the Alaska National Interest Lands Conservation Act of 1980

Proposal 11:

SUPPORT – This proposal, if approved, will shorten the bear hunting season in an area that is regularly visited by tourists for fishing, bear photography, and bear viewing. Shortening the hunting season so these tourists, guides and concessionaire staff are not present while hunting is taking place will help reduce the risk of user conflicts and bear-human conflicts. Bear-human conflicts are more likely when bears are stressed by the presence of hunters. The author of the proposal described an incident in which a hunter-killed bear was retrieved by another bear, who then cached it nearby. This creates an especially dangerous situation for all humans in the area. Given that the bears in this area are so habituated, I question how hunting here could be considered fair chase in this portion of Unit 9C and wonder if hunting should be allowed in this area at all, but I do think Proposal 11 is a step in the right direction. I have traveled to Alaska twice every year since 2017 (with the exception of 2020) for the sole purpose of wildlife viewing and photography. There are many people who are just like me. Given what I have learned about this area, I will likely avoid it in my travels.

Proposal 18:

SUPPORT – If approved, this proposal will help ensure that the brown bear population in this unit meets "high concentrations of brown/grizzly bears" as required by the Alaska National Interest Lands Conservation Act of 1980. Guides and their clients, who visit the area for bear viewing and photography are noticing declining numbers of bears present in this unit, which could ultimately lead to fewer tourism dollars as visitors begin choosing to go elsewhere. The changes suggested in this proposal, including conducting a study into current bear activity in this unit, will help restore the bear population and will allow time to define a sustainable harvest for the area.

Proposal 19:

SUPPORT – Establishing a hunting season and nonresident bag limit for Arctic fox on the Pribilof Islands in Unit 10 will protect foxes during their breeding season, ensuring that the fox population is not

decimated and remains a sustainable level of harvest. At the same time, this proposal protects the livelihoods of residents for whom fox hunting is necessary.

Proposal 20:

SUPPORT – I support this proposal as an alternative if the Board chooses not to establish a hunting season for Arctic fox on the Pribilof Islands in Unit 10 as outlined in Proposal 19. While Proposal 19 is better, Proposal 20 could similarly help prevent the fox population from being decimated, while still protecting the livelihoods of residents for whom fox hunting is necessary.

Proposal 22:

SUPPORT – This will ensure that wolverines can safely seek breeding opportunities and will also give them the best chance at reproduction, ensuring that they do not end up endangered in the state of Alaska.

Proposal 30:

SUPPORT – A three-year moratorium on caribou hunting in these units will help restore a population that is in severe decline.

Proposal 31:

SUPPORT – Closing caribou season in these units until the herd has grown to 30,000 or more would help restore a population that is in steady decline.

Proposal 32:

OPPOSE – An intensive management program is already in place in this unit. Allowing the year-round killing of bears here would make it impossible to determine the efficacy of the intensive management program. Year-round hunting will also interrupt the bears' mating season. Furthermore, all species deserve a resting period to prevent overharvesting and allow for opportunities to reproduce.

Proposal 33:

OPPOSE – Same-day airborne take of bears and wolves seems to be a violation of fair chase, giving humans an unfair advantage. Furthermore, same-day airborne killing of wolves is prohibited by statute unless under a permit issued by an intensive management program.

Proposal 34:

OPPOSE – Same-day airborne take of bears would be a violation of fair chase, giving humans an unfair advantage, especially when bear movement in snow pack could easily be tracked by air. Snow pack also allows air access to areas not available to humans during snow-free months—areas where bears have become accustomed to a respite from human activity.

Proposal 35:

SUPPORT – This proposal will ensure that wolverines can safely den and nurture their young, helping to ensure that they do not end up endangered in the state of Alaska.

Proposal 36:

SUPPORT – This proposal will ensure that wolverines can safely den and nurture their young, helping to ensure that they do not end up endangered in the state of Alaska.

Proposal 49:

SUPPORT – Closing of Nelchina caribou in these units until the herd has grown to 37,500 or more would help restore a population that is in severe decline.

Proposal 57:

OPPOSE – This proposal has the potential to cause overharvesting of bears. Bears reproduce more slowly than other wildlife, and in some areas sows are keeping cubs for additional seasons (3+), so rebuilding a population could take many years. Furthermore, bear viewing in this area is a top activity for Alaska tourists. I have traveled to Alaska twice every year since 2017 (with the exception of 2020) for the sole purpose of wildlife viewing and photography. There are many people who are just like me.

Proposal 58:

OPPOSE – This proposal is extreme and would significantly lower the wolf population from historical numbers. Proposal 49, which addresses the decline of the Nelchina herd, will be more effective.

Proposal 59:

OPPOSE – This proposal will interrupt the wolf breeding season, reducing opportunities for reproduction. Extending the trapping season into late April when the weather allows for more activity (wildlife and humans) also creates more risks to non-target species, including humans and their pets. Furthermore, spring furs are considered to be lower quality.

Proposal 60:

OPPOSE – This proposal will interrupt the coyote breeding season, reducing opportunities for reproduction. Extending the trapping season into late April when the weather allows for more activity (wildlife and humans) also creates more risks to non-target species, including humans and their pets. Furthermore, spring furs are considered to be of lower quality.

Proposal 61:

SUPPORT – Delaying the start of the ptarmigan hunt season in this unit so that it is more in line with breeding and reproduction patterns seems the logical choice. It not only protects this species but also ensures higher quality meat at harvest.

Proposal 70:

OPPOSE – I oppose this as it will likely increase the harvest of brown bears in this region. It also has the potential to interrupt bear mating season, putting the population at risk.

Proposal 71:

OPPOSE – This proposal extends the bear season to late June, a move that has the potential to increase user conflicts and human-bear conflicts as the Alaska tourist season begins. It also has the potential to interrupt bear mating season, putting the population at risk.

Proposal 72:

OPPOSE – Harvest tickets are free and provide ADFG with important data.

Proposal 75:

OPPOSE:

- The removal objectives for Unit 16 are too high, especially given that intensive management programs are already underway in nearby Units 13 and 17. Proposal 75 could easily contribute to severe population decline of bears and wolves across all three units.

- The broad-sweeping predator reduction proposal does not present supporting data or goals regarding the moose population. If protection of moose is the goal, please keep in mind that similar predator control programs in Unit 16 in the past were halted after being deemed ineffective. In fact, as recently as 2019, population estimates indicated that the moose population in Unit 16 was well above the midpoint population objective, and harvest was also well within objectives and approaching the midpoint.

- The area outlined in the proposal lies between Denali National Park and Preserve and Lake Clark National Park and Preserve, two areas where wildlife viewing is a lucrative industry. Lodges, guides, float plane operators and more could suffer financially should bear and wolf populations decline in those neighboring areas. Visitors are already noticing a decline in bear activity in other top wildlife photography and viewing areas in the state. I have traveled to Alaska twice every year since 2017 (with the exception of 2020) for the sole purpose of wildlife viewing and photography. There are many people who are just like me.

- This effort will also be costly for the state. Per the Board of Game's 2024 annual report, the Intensive Management program focused on bears and wolves just a few hundred miles west cost $231,000 in 2022 and $612,000 in 2023.

Proposal 76:

OPPOSE – Same-day airborne take violates fair chase, especially in certain months. Snow pack will allow hunters to track bears more easily, and will also give hunters access to areas that are not available during snow-free periods. This would give humans an unfair advantage.

Proposal 77:

OPPOSE – This proposal extends the bear season into mid-June, a move that has the potential to increase user conflicts and human-bear conflicts as the Alaska tourist season begins. It will also interrupt bear mating season.

Proposal 79:

OPPOSE – Extending the trapping season into late April increases the risk of harming non-target species and is also likely to interrupt breeding. Furthermore, furs are of poor quality during breeding season.

Proposal 80:

SUPPORT – Given the concerns about the decline in the beaver population in Unit 16, requiring sealing of beaver taken in that area will provide ADFG with valuable data needed for future wildlife management decisions and plans.

Proposal 81:

SUPPORT – Requiring trappers to check traps set within two miles of publicly maintained roads at least once every 36 hours is a reasonable expectation. Similar requirements are common in other states and on some federal lands in Alaska. More frequent trap checks will minimize suffering of trapped animals, increase the likelihood of safely releasing non-target animals, and reduce waste.

Proposal 82:

SUPPORT – If this proposal is approved, it will help protect those who use this area and these trails for recreational purposes and will still allow trappers to continue their work. The proposed setbacks will reduce incidental injury to people and pets. The proposal, which was drafted in a collaborative effort between trappers and nontrappers, offers easy-to-implement, reasonable solutions and flexibility for all involved (including, if deemed necessary, a temporary permit system for wildlife management).

PC107

Name: Carrie Freeman, PhD

Community of Residence: Atlanta, GA USA

Comment:

Hello, I'm commenting on Proposal 29 - Mulchatna Caribou Herd Population Review. I am greatly in support of Proposal 29 and doing more scientific/evidence-based research on the actual causes of the caribou herd's decline. Since it largely has not been established that killing bears and wolves will significantly help the caribou, and it significantly hurts those bear and wolf communities and all that they add to the ecosystem wellbeing, there is no reason to be killing anyone. I also don't think humans should be killing any caribou unless it is for subsistence/food, especially for isolated populations and Native Alaskan tribe members.

I realize that I am not from Alaska, but I am a fellow American citizen who recently visited my cousin there, [redacted], a long time resident in Anchorage, and I travelled around the Juneau area and the Kenai peninsula and saw two national parks (Kenai Fiords, and Glacier Bay). This Alaska visit was part of my quest as a researcher to interview wildlife advocates across Alaska about human-nonhuman-animal coexistence issues (this includes former Board of Game member [redacted]). So I am staying abreast of all the issues affecting animals in Alaska (such as through my membership in the Alaska Wildlife Alliance), and I am keen to protect the interests of all wild/free animals and not have predator/carnivorous animals be continually blamed and persecuted to supposedly benefit humans (as in having more 'prey' animals for some humans to eat or kill for fun or tourism). These bears and wolves are individuals with families and cultures and do not deserve to be targeted for random killings at gunpoint. Plus they are additionally highly valuable for Alaska's biggest industry -- tourism -- and when kept alive and safe, they produce more babies and continue to populate the region and add to its ecosystem benefits/health (and be a joy for visitors and Alaskans to view and photograph).

Ethically, we (particular the European settler Americans) actually owe wildlife reparations not further persecution and violence. Please cater to the interests of the residents of Alaska -- including the native wildlife. They deserve as much as if not more consideration than us human animals at this point in history.

Please support Proposal 29 and any measure that benefits individual wild animal lives and their families/communities. Thank you.

I am opposed to Proposal 75 - Aerial Gunning Outside of Denali. Please vote against Proposal 75 from a human decency and environmental responsibility standpoint. No one deserves to be gunned down by helicopter -- talk about an unfair fight! Are you willing to let that happen to you?! The stress that puts on whole communities and families of animals and how it separates them, likely orphaning and killing even more members of the bear and wolf communities targeted is immense and unnecessary. I was so impressed to read about the Denali area wolves from Gordon Haber's many years of work (as documented in Marybeth Holleman's book "Among Wolves"). He was about to prove how each wolf family is its own culture and when individuals are randomly targeted, it can destroy and eliminate that culture as the other family members sometimes can't survive or don't ever learn the unique hunting or parenting skills of the members that were gunned down by humans or needlessly caught in traps. I really cannot see any legitimate and ethical reason to target and kill native wildlife (by gun or trap), especially when it isn't for subsistence foods/skins. That kind of violence is immoral and the harm it does to ecosystems is unjustified. We all know that most of us humans are the really damaging species, so why persecute and blame other animals when most of the fault is our own?

I realize that I am not from Alaska, but I am a fellow American citizen who recently visited my cousin there, [redacted], a long time resident in Anchorage, and I travelled around the Juneau area and the Kenai peninsula and saw two national parks (Kenai Fiords, and Glacier Bay). This Alaska visit was part of my quest as a researcher to interview wildlife advocates across Alaska about human-nonhuman-animal coexistence issues (this includes former Board of Game member [redacted]). So I am staying abreast of all the issues affecting animals in Alaska (such as through my membership in the Alaska Wildlife Alliance and reading books by Alaskans), and I am keen to protect the interests of all wild/free animals and not have predator/carnivorous animals be continually blamed and persecuted to supposedly benefit humans (as in having more 'prey' animals for some humans to eat or kill for fun or tourism). These bears and wolves are individuals with families and cultures and do not deserve to be targeted for random killings at gunpoint. Plus they are additionally highly valuable for Alaska's biggest industry -- tourism -- and when kept alive and safe, they produce more babies and continue to populate the region and add to its ecosystem benefits/health (and be a joy for visitors and Alaskans to view and photograph).

Ethically, we (particular the European settler Americans) actually owe wildlife reparations not further persecution and violence. Please cater to the interests of the residents of Alaska -- including the native wildlife. They deserve as much as if not more consideration than us human animals at this point in history.

Please oppose proposal 75 aerial gunning of individuals.

Please support Proposal 82, Palmer trapping setbacks. It's really a no-brainer that we wouldn't put dangerous and potentially lethal traps near places where people and their companion animals are recreating -- like we wouldn't put landmines near playgrounds. Honestly, we shouldn't put landmines anywhere, and traps are akin to that - indiscriminate mechanisms for maiming and killing sentient beings/mammals. So there shouldn't be any traps put on any public lands to maim and kill anyone (for the supposed financial benefit of a few people -- people acting selfishly, trying to profit at the expense and suffering of innocent others -- others who are actually helping the ecosystems more than the trappers likely are). It doesn't take an ethicist to see that doesn't make any moral or ecological sense.

I realize that I am not from Alaska, but I am a fellow American citizen who recently visited my cousin there, [redacted], a long time resident in Anchorage, and I travelled around the Juneau area and the Kenai peninsula and saw two national parks (Kenai Fiords, and Glacier Bay). This Alaska visit was part of my quest as a researcher to interview wildlife advocates across Alaska about human-nonhuman-animal

coexistence issues (this includes former Board of Game member [redacted]). So I am staying abreast of all the issues affecting animals in Alaska (such as through my membership in the Alaska Wildlife Alliance), and I am keen to protect the interests of all wild/free animals and not have predator/carnivorous animals be continually blamed and persecuted to supposedly benefit humans (as in having more 'prey' animals for some humans to eat or kill for fun or tourism). These bears and wolves are individuals with families and cultures and do not deserve to be targeted for random killings at gunpoint. Plus they are additionally highly valuable for Alaska's biggest industry -- tourism -- and when kept alive and safe, they produce more babies and continue to populate the region and add to its ecosystem benefits/health (and be a joy for visitors and Alaskans to view and photograph).

Ethically, we (particular the European settler Americans) actually owe wildlife reparations not further persecution and violence. Please cater to the interests of the residents of Alaska -- including the native wildlife. They deserve as much as if not more consideration than us human animals at this point in history.

Please support Proposal 82. Thank you.

Friends of the Island Fox
a 501(c)(3) nonprofit organization
Federal Tax ID # 84-5114320

In Support of Proposals 19 and 20

Supporting Comments for Proposal 19: Shortening the Arctic Fox Hunting Season and Reducing Nonresident Bag Limits

As a nonprofit organization working with land managers for 20 years on the successful recovery of the formerly endangered Channel Island fox in California, Friends of the Island Fox has experienced how rapidly disease or ecological impacts can lead to near extinction of an island canine species.

Proposal 19 is a critical step in addressing the conservation concerns surrounding the genetically distinct Pribilof Arctic fox (*Vulpes lagopus pribilofensis*). The proposed changes are rooted in sound wildlife management principles and aim to balance ecological conservation with the cultural and subsistence needs of local residents.

1. Protecting a Declining Population
   Pribilof Arctic fox populations are demonstrably declining due to reductions in natural food resources, such as northern fur seals and seabird colonies, and face additional challenges from environmental stressors such as climate change and disease. A prolonged open season and unlimited bag limits exacerbate this decline, especially given the lack of comprehensive population monitoring or harvest data. By shortening the hunting season and reducing nonresident bag limits, Proposal 19 provides an immediate, enforceable measure to reduce anthropogenic pressures on this vulnerable population.
2. Genetic and Ecological Importance
   As an endemic subspecies, Pribilof Arctic foxes are uniquely adapted to their environment, serving vital ecological roles. They act as natural predators of invasive species such as rodents, which pose a threat to the islands' biodiversity. Overharvesting of these foxes, particularly by nonresidents with no vested interest in long-term population sustainability, jeopardizes their ecological function and genetic diversity.
3. Addressing Conservation Gaps
   Unlike their introduced counterparts on the Aleutian Islands, Pribilof Arctic foxes lack targeted conservation measures. Current regulations fail to distinguish between the endemic Pribilof foxes and introduced Arctic fox populations elsewhere in Unit 10. Proposal 19 begins to rectify this oversight, establishing a framework for species-specific management that considers the unique status of Pribilof Arctic foxes.
4. Supporting Local Needs and Reducing Overharvest Risks

The proposal accommodates residents' ability to address nuisance animals during the shortened season while mitigating the risk of unsustainable harvest by nonresidents. Limiting nonresident take to two foxes aligns with conservation priorities while preserving opportunities for local subsistence use and ecological management.

Adopting Proposal 19 is an essential step toward ensuring the long-term viability of the Pribilof Arctic fox population while respecting local community needs.

Supporting Comments for Proposal 20: Establishing a Nonresident Bag Limit for Arctic Fox Trapping

As a nonprofit organization working with land managers for 20 years on the successful recovery of the formerly endangered Channel Island fox in California, Friends of the Island Fox has experienced how rapidly unexpected impacts can challenge the sustainability of an island canine species.

Proposal 20 complements Proposal 19 by introducing a specific limit for nonresident Arctic fox trapping on the Pribilof Islands. This measure reflects a pragmatic approach to conservation, aiming to safeguard the endemic Pribilof Arctic fox while addressing gaps in current regulations.

1. Mitigating Overharvest by Nonresidents

With no existing bag limits for nonresidents, Arctic foxes on the Pribilof Islands are particularly vulnerable to overharvesting by visiting trappers, who often have no local conservation or ecological commitments. Establishing a two-fox limit for nonresidents curbs the potential for unsustainable take of this endemic island species while allowing residents to maintain their traditional practices without additional restrictions.

2. Protecting a Vulnerable Population

As a small, genetically isolated population, Pribilof Arctic foxes are acutely susceptible to external pressures. Trapping without limits could exacerbate existing population declines caused by diminished food availability, climate change, and disease risks. Implementing a nonresident bag limit ensures a more measured harvest aligned with the species' conservation status.

3. Balancing Conservation and Local Livelihoods

This proposal carefully avoids imposing undue restrictions on local residents, recognizing the importance of fox trapping as a cultural and subsistence practice. By focusing solely on nonresident take, Proposal 20 prioritizes the ecological health of the Pribilof Arctic fox population while maintaining the community's ability to manage resources sustainably.

4. Advancing Monitoring and Management

While local oversight programs are still developing, Proposal 20 lays the groundwork for better population management and monitoring. Limiting nonresident harvest is a manageable step toward aligning hunting and trapping practices with conservation needs, even in the absence of rigorous enforcement mechanisms.

By adopting Proposal 20, the Alaska Board of Game will take a significant stride toward equitable and sustainable management of the unique Pribilof Arctic foxes, ensuring their ecological and cultural importance is preserved for future generations.

Michael Watling
President

Patricia Meyer
Vice President

Keri Dearborn
Treasurer

PC109

Name: Todd Fritze

Community of Residence: Dillingham

Comment:

I am in favor of Proposal 32 as we have a abundance of brown bears and this will allow the take of bears potentially before it becomes a DLP matter

I am in favor of proposal 37 as this will take what has been one of the most confusing regulations for beaver in the sate and stream line the regulations. Furthermore If I can take 30-40 beaver in. day trapping why should I be limited to only 2 a day shooting.I t is rare that a person can cover the ground necessary at the time beaver are active to take more then 3 or4 beaver in a day with a firearm.

I appose both 35 and 36 for the following reasons: As a trapper who has trapped the same lines extensively one for 25 years and the other for 13 years I have seen a steady rise in wolverine numbers I didn't see a wolverine track on my oldest line for approximately 15 yrs now in the last 10 tracks are common and I catch a wolverine approximately every other year. On my newer line I have always had wolverines the first two years I didn't catch a wolverine and saw tracks just few times. The third year I caught a wolverine in a set that I had been setting the previous years without increasing the number of sets my wolverine catch has been no less than 2 every year since with a high of 4 in all those wolverine I have caught fair number in March and never caught one that was lactating.I have talked with most of the local trappers and they all reported the same thing that they had never harvested a lactating wolverine. In addition I catch most of my wolverine in sets that are primarily for lynx I catch 1/3rd of my annual lynx catch in March. The idea of having to turn a live wolverine loose to become a very smart trap savy wolverine on my line could be very detrimental to the line itself in the future.

With an increasing amount of wolverines being found in unit 17 it doesn't make a lot of sense to me to shorten the season when trappers don't appear to be taking nursing wolverines if they were I would be the first to support this but it just isn't happening.

Thank you for your time and consideration of my comments

PC110

Name: Connie Fuess

Community of Residence: MatSu Valley - Wasilla Fishhook

Comment:

Proposal 82

I vehemently, oppose opening these areas to trapping ! In fact I would like to express deep concerns and personal outrage regarding trapping in the areas discussed in Proposal 82.- Particularly Hatcher Pass trails and MatSu Lakes area.

Within the past two weeks at the Moose Range, on the Palmer end where trapping is allowed, two of my dogs have been badly injured in foothold traps. These traps were set just a few yards from the trails. Additionally, a fellow hiker shared that he has released three bald eagles recently from the same traps. Trappers are not abiding by the laws and guidelines now, it is unreasonable to believe that they will in

these new areas. Animals and people will get injured. There is very little incentive for non-rule abiding trappers to follow the guidelines, as there is minimal monitoring and no recourse for those that have incurred injuries or loss due to these traps.

Opening these proposed areas to trapping will have negative consequences to the public and the economics of the area. Again pets, and potentially people, will get caught and injured. Even if trappers are following the guidelines many pets will sent out the baited traps easily. 50 yards is not far enough away for any of my dogs to not to smell fresh bait. Once word travels through the community it will quickly reach tourists. For places like Hatcher Pass this will have a significant financial impact as people will seek out safer places to hike with their children and pets. I am a long time Alaskan who moved to the Valley because of places like Hatcher Pass. If this proposal was to pass, I would think about leaving the state; it poses that significant of an impact. There are thousands of acres for trappers in Alaska, we do not need to open these highly visited and utilized trails.

To complicate things many of the proposed areas do not allow four wheelers. Trappers will have to hike their gear and catches in and out by foot. For less respectable trappers, this will encourage them to trap along the most frequently traveled sections of these trails. This will be tragedy just waiting to happen …and to hit the news.

I am not against trapping, but these heavily used areas are not the places to expand trapping rights. For the good of the residence and the economy of our local community do not pass this proposal.

Appreciatively,

A long time Alaskan

PC111

Name: Wesley Funkhouser

Community of Residence: Wasilla

Comment:

I would like to express my support for Prop 3 and Prop 70.

PC112

Name: Celia Garland

Community of Residence: Wolfeboro

Comment:

I am writing in opposition to proposal 73. Culling apex predators is amoral at its worst and lazy management at its best. The environment and competition regulate predators.

PC113

Name: Valerie Gleaton

Community of Residence: Missoula, Montana

Comment:

I am writing to voice my strong OPPOSITION of Proposal 75. Wolves and bears require protection, not eradication.

I am also writing to voice my strong SUPPORT of Proposal 11.

PC114

Name: Greg Goodmacher

Community of Residence: California

Comment:

Regarding proposal 11, I hope you will shorten the bear hunting season. Bears are iconic American animals. I visit Alaska in the hope of viewing bears. Reduce hunting and increase ecotourism, please.

PC115

Name: Rebecca Goodrich

Community of Residence: Anchorage, Alaska

Comment:

I oppose Proposals 33, 59, and 75. Healthy wolf populations do the work of culling prey herds, protect rivers by limiting the time ungulates stay by the river edges, which reduces erosion and maintains water quality. Humans cannot do what wolves do, which includes limiting their own population. Human intervention with this species reduces wolf effectiveness for no good reason. It comes with a waste of time and money. Public education about the actions of wolves in our ecosystems would be a better use of the time and money. There is already at least one good video on the study of how wolves saved Yellowstone National Park and improved its rivers. this study is the kind of information we should use before doing the knee-jerk "let's kill wolves" reaction. I want my comment to be become part of the permanent record in this matter. Thank you.

PC116

Name: Shannon Gordy

Community of Residence: Illinois

Comment:

Prop 16.

Animals have every right to be here. Without them, our ecosystem would fall apart. Culling them down to dwindling numbers is not only cruel and inhumane, it is illogical. Removing predators creates an abundance of smaller animals, which wipes out the foliage, causing problems like flooding, drought, and not enough food for the small animals.

A perfect example is how returning the wolves to Yellowstone helped the ecosystem flourish, down to the riverbeds.

Do not kill off predators. Leave nature be.

PC117

Name: Janice Gorle

Community of Residence: Juneau

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Janice Gorle DATE: 12-24-2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With

studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature’s balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

NAME Janice Gorle

ADDRESS [redacted] Ave, Juneau, AK 99801

PC118

Name: Julie Gorman

Community of Residence: United Kingdom

Comment:

Written Responses to the proposals of the ADFG

NAME: Julie Gorman DATE: 25th December 2024

Commenting on all proposals.

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Alaska's important and valued wildlife and the natural balance of its ecosystems would be harmed and threatened by many of these proposals. Wilderness areas worldwide are under increasing threat, and Alaska is one of the last great wilderness areas in the United States. People travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

By allowing over hunting there may bring short-term profits, but at great risk of long-term devastation. Over hunting of key species, such as brown bears, caribou, and moose, will disrupt the food web and ecosystem, thus making it harder for all animals to survive. If there are no animals to see the tourists will stop coming, and then there will be no money from hunting or tourism, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

There is increasing support for the preservation and increased numbers of wildlife around the world. The proposed increase in slaughter and decreasing in numbers of such significant and revered wildlife in one of the last great wilderness areas does not put Alaska in a good light.

I have addressed each proposal below in order to explain why these proposals are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee not only encourages more hunting, but also reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly, at a rate of only every 4 to 6 years, so over hunting could certainly wipe them out. Protecting bears would be much better for Alaska's economy as tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

This would result in the loss of a greater number of bears. Baiting bears with food teaches them to rely on human handouts. This then makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, nor is it much of an achievement for the hunter. Also, killing bears that are just trying to survive naturally, harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

The use of cameras to hunt bears disrupts all wildlife by bringing too many people into sensitive habitats. Hunting this way gives the hunters a huge advantage over the bears, and puts too much pressure on bear populations that are already struggling. It also reduces the skill needed by hunters and so, surely devalues their "triumph".

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. By over hunting them their predators, such as bears, would be forced predators to find food elsewhere. This could lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the non-resident bag limit for caribou

Whilst limiting caribou hunting is a good idea, care must be taken to prevent hunters from shifting their focus to other animals, such as bears, which are already at risk, or moose. Caribou can reproduce every year, whereas bears reproduce very much more slowly, so they need more protection. There are indications that some populations are collapsing due to human activity; therefore, it would be prudent for all non-resident hunting to be stopped until such time as reasons for this are made clear through scientific facts and studies. Only indigenous people specifically using them as a food source, not a trophy, should be allowed to hunt caribou.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the non-resident caribou hunting season

While shortening the non-resident hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. So, the same comment applies to this as to proposal 5. Given collapses in most populations, would it not be prudent to only allow indigenous people to hunt, and to NOT allow non-residents to hunt caribou.

SUPPORT WITH AMENDMENT Proposal 7: Extend the fall Southern Alaska Peninsula caribou season

Extending the hunting season would not only disturb caribou, but also all other wildlife, thus putting pressure on the delicate ecosystem in which they live. Also, with caribou numbers already low, an extended hunting season, leading to even lower numbers, would put extra pressure on those animals,

which prey on them, and who are already under pressure. With studies showing collapse in all of the populations, hunting should ideally be limited to indigenous people specifically hunting for food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Although reindeer aren't native, allowing hunting could disturb the island's natural balance as it's evolved.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons would put too much pressure on bear populations. These would take years to recover, if ever, because they reproduce so slowly. Bears are crucial for the ecosystem. Over hunting them could cause long-term harm, both to the ecosystem and to the lucrative tourist industry.

SUPPORT WITH AMENDMENT Proposal 10: Close Unit 9A to non-resident brown bear hunting

This is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

SUPPORT WIT AMENDMENT Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening the hunting seasons would be a positive step for bear conservation. However, not hunting during critical times, such as when bears are getting ready for hibernation, would further help to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting seasons would put huge pressure on bear populations. These populations would find it difficult to recover due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and non-residents

Lengthening the hunting seasons, especially for everyone, would lead to even more over hunting and put bears at even greater risk. This not only harms bears but also their entire ecosystem.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and non-residents

This proposal would lead to even more over hunting, which, given the pressure bears are already under, could devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen non-resident spring brown bear hunting season in Units 9D and 9E

Again, this would put too much pressure on bear populations that are already struggling. No bears mean tourists are much less likely to visit.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and non-residents

Expanding the fall hunting season would result in more bears being lost thus negatively affecting bear populations, damage the ecosystems that depend on them, and in turn, negatively affect tourism.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and non-residents

Lengthening any hunting season will put bears and their populations under further pressure, but spring and fall are when they are at their most vulnerable, and puts cubs at risk. This could wipe out the population in the long term.

SUPPORT WITH AMENDMENT Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

The bear population in Katmai National Park is very well monitored by naturalists and rangers, as well as live camera viewers and park visitors. Because of this monitoring it is well known that a significant number of the regular bears failed to return to Brooks Falls this year. Bear viewing, especially the Brooks Falls bears, brings a huge amount of attention and revenue to the state. These bears have a huge following worldwide; and in fact this years Fat Bear Week contest saw between 80,000 – 100,000 people voting on a daily basis. Bear and wildlife enthusiasts come from all over the world to visit this area, many visiting multiple times. Alaska cannot afford to lose the revenue from this wildlife loving public. Ecotourism is sustainable long term, hunting is not.

SUPPORT WITH AMENDMENT Proposals 19 and 20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Over hunting them could lead to overpopulation in rodents, so upsetting the delicate balance of the ecosystem.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands on which many animals rely. These habitats are now recognised as being so important that beavers are being reintroduced in some countries. Over hunting them would destroy these habitats and harm the entire ecosystem.

SUPPORT Proposal 22: Shorten wolverine hunting and trapping seasons

This is a good proposal, as wildlife the world over needs protection.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Lengthening the hunting season would lead to over hunting, which would harm the scavengers and predators, including bears, which rely on these areas for food.

SUPPORT Proposal 24: Close the season for Alaska hares

A good proposal as all wildlife needs protection due to climate change and habitat loss.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans. Also, ADFG states that hunting should be avoided while there is a predator control program in place, which there is in this area.

SUPPORT Proposal 28: Reduce population and harvest objectives for the Mulchatna caribou herd

There is a predator control program in place in area 17. ADFG states that hunting should be avoided while such programs are in place.

SUPPORT WITH AMANDMENT Proposal 29: Review the population and harvest objectives for the Mulchatna caribou herd

Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. State biologists have determined the main reasons for the decline are disease, lack of food due to climate change, and poaching. A review should consider a reduced population potential. Perhaps NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

SUPPORT Proposals 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears in Unit 17

Bears can only reproduce slowly, every 4 to 6 years; so year-round hunting would quickly deplete numbers to extinction levels. A resting period from hunting is necessary for all species. Also, ADFG states that hunting should be avoided while there is a predator control program in place, which there is in this area.

OPPOSE Proposals 33 and 34: Allow airborne hunting of bears and wolves

Hunting in this way is not only extremely disrupting to wildlife, but could very easily lead to population crashes that harm the whole environment due to the large number of likely kills. Same day airborne take of wolves in Unit 17 is prohibited by statute unless under a permit issued be an IM program.

SUPPORT WITH AMENDMENT Proposals 35 and 36: Shortening hunting and trapping seasons for wolverine in Units 9 and 17

ADGF states that hunting should be avoided while a predator control program is in place, which it is in Unit 17.

OPPOSE Proposals 37 and 38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

SUPPORT Proposal 39: Reduce population and harvest objectives for moose in Unit 13C

This would reduce population and harvest objectives to more reasonable numbers.

SUPPORT WITH AMENDMENT Proposal 40: Change the population objective for moose in Unit 13C

Only change if it is in support of protecting moose and decreasing hunting, so to protect their numbers.

SUPPORT Proposals 41 and 42: Reduce harvest objectives for moose

A good proposal to support moose numbers in these areas.

OPPOSE Proposals 43 and 44: Establish an antlerless moose season

This would result in the loss of even more moose, and so put more pressure on moose populations, in turn affecting the environment.

OPPOSE Proposal 45: Add a five-day archery only season for hunting moose in Unit 13

This would increase hunting and so lower the moose population, therefore affecting the local ecosystems.

OPPOSE Proposals 46, 47: Changes to moose hunting

Changes should only be made if they reduce hunting and protect moose numbers. Decreasing populations has a negative knock on affect on the ecosystem.

OPPOSE Proposal 48: Modify the intensive management plan for Unit 13 to include Nelchina caribou

Caribou numbers need protecting, they do not need to be hunted. They are critical prey for predators and decreasing their numbers will upset natures balance.

SUPPORT Proposal 49: Eliminate the harvest of Nelchina caribou

This would allow the herd to reach the management objective of 37,500.

OPPOSE Proposals 50 - 56

Sheep and goats are critical prey for predators. Over hunting them forces those predators, bears and wolves, to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposal 57: Increase the bag limit for brown bear in Unit 13

This would double the bag limits for brown bears. With the reproduction rate of bears being so slow, these losses would be overwhelming and their numbers could drop rapidly to catastrophic levels.

OPPOSE Proposal 58: Reduce the minimum wolf population in the Unit 13 Intensive Management Plan for wolves

This would reduce the minimum wolf population in Unit 13's Intensive Management Plan to 100. This would lower the population significantly from historic numbers.

OPPOSE Proposals 59 and 60: Lengthen the wolf and coyote-trapping season in Unit 11

Lengthening the trapping season would interrupt the breading season, thus having double the negative affect on population numbers. Wolves and

coyotes are necessary to keep small mammal populations under control. Also, spring furs are of lower quality.

SUPPORT WITH AMENDMENT Proposals 61 and 63: Change start date for ptarmigan hunting season and require a registration permit

AS long as changing the start date means the hunting season will be shorter, these proposals will mean less ptarmigan will be hunted. This can only be a good thing, as all wildlife now needs protecting.

OPPOSE Proposal 62: Extend the spring hunting season for ptarmigan in Units 13A, 13C, and 13D

Ptarmigan are food for many predators, including bears. This proposal would mean more hunting which would decrease their numbers, and so disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67: Relating to moose hunting

Increasing moose hunting at the current levels is hard enough on the moose population, introducing NEW hunting seasons and handing out more permits will only make the situation worse and decrease numbers further.

SUPPORT WITH AMENDMENT 65, 68, 69: relating to moose hunting

Decreasing the number of permits, lowering the bag limit, and shortening the season is a positive step in protecting population numbers. However, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is waste of a very limited natural resource, one that can save lives in the harsh Arctic.

OPPOSE Proposals 70, 71: Extending brown bear hunting season in Units 14A and 14B

Extending the hunting season of bears will put added pressure on the populations. Brown bears reproduce slowly and any reduction in numbers, especially large or sudden reductions, would take a long time to recover from, if indeed that were even possible.

OPPOSE Proposal 72: Eliminate the harvest ticket requirement for hunting black bear in Unit 16

This would increase the number of bears being hunted. This would significantly affect population numbers and have a detrimental affect on the ecosystem.

OPPOSE Proposals 73 and 74: Changes to sheep hunting

These proposals could lead to over hunting and hugely reduced sheep numbers. In turn, this could lead to a shortage of food for predators, causing an imbalance in the local ecosystem.

OPPOSE Proposal 75: Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan

Studies have already shown that Alaska's predator control programs, aimed at boosting caribou, moose and deer populations for hunters, do not work.

This plan would remove 73-80% of wolves, 60% of brown bears, 60-80% of black bears, reducing numbers to dangerously low levels, thus threatening their extinction in this area. This fails to make sense considering the efforts taken to get their numbers up, especially when other parts of the world are trying to bring these species back because their importance and value has been recognised.

The management of large carnivores in Alaska is a backward step to outdated management concepts, which lack effective monitoring programs to scientifically evaluate impacts on predator populations, or identify the relationships between predator control and prey population dynamics. Any

large carnivore management should be based on rigorous science, which this program is not.

The proposed aerial gunning program borders some of the most iconic wildlife viewing areas in the world. Predator control is not popular in this age of wildlife preservation, and the reputation of the state as a responsible wildlife manager is being very badly tarnished in the eyes of the world.

ADFG has admitted that this proposal would be very costly. Such a cost surely cannot be justified, especially when weighed against the losses from ecotourism, which will surely follow.

OPPOSE Proposals 76 - 79: Extending wolf and bear hunting and trapping seasons, and allowing same day airborne take

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

There should be no airborne hunting for the reasons stated in my comments on proposal 75.

SUPPORT WITH AMMENDMENT Proposal 80: Require sealing of beaver taken in Unit 16

It is well documented that beaver are essential to providing and maintaining certain environments. Any action to prevent a reduction in beaver numbers is helpful, but it would be better to reduce the number of beaver being killed.

SUPPORT WITH AMMENDMENT Proposal 81: Require traps and snares set within two miles of publicly maintained roads in Unit 14A be checked at least every 36 hours

I appreciate that some trapping is necessary, especially for indigenous people, but it causes great suffering to the animals. With this in mind, it would be better if traps were checked more often than every 36 hours, perhaps every 24 hours.

SUPPORT Proposal 82: Establish 50-yard trapping setbacks along specific trails in Unit 14

People and their dogs, using trails for recreation purposes, get injured every year by traps. This proposal would help keep people and their dogs safe. Trapping setbacks are easy to put in place, and have been shown to be effective safety measures in other areas.

The distance proposed for the setback is small enough to not significantly reduce the management of wildlife.

Trappers have already agreed this.

OPPOSE Proposals 83 and 84: Extend the spring hunting season for ptarmigan in Unit 16, and extend the spring hunting season for ptarmigan in Units 14A and 14B

This would result in higher losses of ptarmigan numbers. Wildlife the world over is struggling because of habitat changes due to climate change and human interference. With that in mind, it is nit a good idea to increase hunting and reduce populations further. Ptarmigan are a valuable food source for higher predators, and reducing their numbers would have a negative affect up the food chain.

In Conclusion:

The majority of these proposals will have a detrimental affect on Alaska's wildlife and environment. Protecting animals and promoting eco-tourism is better for the state's long-term economy and ensures a future where Alaska's wildlife can thrive.

Thank you for reading.

Julie Gorman

[redacted],

Alrewas,

Staffordshire,

DE13 7AL

UK

PC119

Name: Mike Gray

Community of Residence: Mat Su Valley

Comment:

I am commenting in opposition to proposals 51 and 52. Currently, there is unlimited resident opportunity in the selected area of unit 11. If this proposal were to be approved it may put more hunting pressure and harvest on the already declining sheep population in this area. MacColl Ridge's close proximity to a hunting lodge makes the health and management of the sheep population in its best interest. This proposal's approval would be the start of a slippery slope of closures of small isolated ridges and valleys to nonresident hunting all over the state with out biological reasoning.

PC120

Name: Nancy Gregory

Community of Residence: Littleton

Comment:

I strongly oppose Proposal 75. As we know, Alaska's predator program does not increase human moose harvest. ADFG should not have full reign to implement an aerial gunning plan in Unit 16 because it would then have the authority to develop an Operational Plan for aerial gunning that is not open to public comment which is unacceptable. Additionally, large carnivore management in Alaska is a reversion to very outdated management concepts and occurs without effective monitoring programs that are designed to scientifically evaluate impacts on predator populations or identify causal relationships between predator control and pre-population dynamics.

I strongly oppose Proposal 59 which is asking for a longer wolf trapping season in Unit 11. This is needless. The current season runs from November 10 – March 31, but the proposal asks for a new season extending from October 15 – April 30 in order to give people more time to kill more wolves. As you are well aware, traps are extremely inhumane and inherently nonselective. They injure and kill countless

nontarget animals annually, including endangered and threatened species and even family pets. Traps often injure people too when attempting to release a trapped animal. In their comments, ADFG acknowledges that extending the trapping season poses a risk to non-target species but they support the proposal despite these risks.

PC121

Name: adam grenda

Community of Residence: King Salmon

Comment:

I am the author of proposal 34. After further consideration and talking with many outfitters and ADFG, I believe this proposal would be best suited to include residents as well as non-residents.

This would increase take, stimulate the local economy and increase revenue for the state.

PC122

Name: Linda Griffith

Community of Residence: Tucson, AZ

Comment:

Proposals Opposed for reasons stated in the comments:

1,2,3,4,7,8,9,12,13,14,15,16,17,19,21,23,25,26,28,32,33,34,37,38,43,44,45,50,57,59,6062, 66,67,70,71,72,73,74,75,76,77,78,79,83,84

Wildlife populations are subjected to sufficient climate-related stressors that support, not hunting, of these populations should be enacted.

Inhumane and Unethical Methods: Aerial shooting and lethal removal are cruel, indiscriminate, and cause unnecessary suffering to wildlife. History has shown these methods escalate quickly without proper oversight.

Threat to Ecosystem Balance: Wolves and bears play vital ecological roles by regulating prey populations. Removing these predators destabilizes ecosystems, threatening biodiversity and long-term environmental health.

Lack of Transparency and Oversight: Proposal 75 grants broad, unchecked powers to the Alaska Department of Fish and Game with no clear limits, oversight, or public accountability—setting the stage for widespread and indiscriminate killing.

Conservation and Economic Risks: Healthy predator populations are vital for Alaska's wilderness and tourism economy. Lethal predator control undermines these populations, harms conservation efforts, and threatens wildlife-based economic opportunities.

PC123

Name: Richard Guthrie

Community of Residence: Anchorage

Comment:

2025 Board of Game Central & Southwest Region Meeting

Proposal #9

I SUPPORT Proposal #9.

I hold Alaska Master Guide License #94 and have conducted Brown Bear hunts in

GMU 9D for more than 40 years. Although there may have been slight fluctuations in the Bear population during that time, overall I feel the trend has been a general increase in Bear numbers in GMU 9D.

I would expect that the proposed longer seasons would result in a slight increase in the Bear harvest.

My personal observations lead me to believe that a SLIGHT increase in the Bear harvest is biologically sound and sustainable without degrading the trophy quality of Bears or the hunter's experience.

Additionally, due to the challenging weather conditions on the Alaska Peninsula, I believe that a slightly longer Bear season would also be beneficial from a safety standpoint. Most hunts on the Alaska Peninsula rely on small aircraft for support. A slightly longer season will allow more flexibility in determining when flights can safely be made. This is particularly important during the Fall season.

If the Board feels that an increase in the length of the season is not justified, I would ask that the Board consider keeping the October season at the same 15 day length but change the season dates to October 1 through October 15.

Thank you for considering my comments.

2025 Board of Game Central & Southwest Region Meeting

Proposal #12

I SUPPORT Proposal #12.

I hold Alaska Master Guide License #94 and have conducted Brown Bear hunts in

GMU 9D for more than 40 years. Although there may have been slight fluctuations in the Bear population during that time, overall I feel the trend has been a general increase in Bear numbers in GMU 9D.

I would expect that the proposed longer seasons would result in a slight increase in the Bear harvest.

My personal observations lead me to believe that a SLIGHT increase in the Bear harvest is biologically sound and sustainable without degrading the trophy quality of Bears or the hunter's experience.

Additionally, due to the challenging weather conditions on the Alaska Peninsula, I believe that a slightly longer Bear season would also be beneficial from a safety standpoint. Most hunts on the Alaska Peninsula rely on small aircraft for support. A slightly longer season will allow more flexibility in determining when flights can safely be made. This is particularly important during the Fall season.

If the Board feels that an increase in the length of the season is not justified, I would ask that the Board consider keeping the October season at the same 15 day length but change the season dates to October 1 through October 15.

Thank you for considering my comments.

2025 Board of Game Central & Southwest Region Meeting

Proposal #13

I SUPPORT Proposal #13.

I hold Alaska Master Guide License #94 and have conducted Brown Bear hunts in

GMU 9D for more than 40 years. Although there may have been slight fluctuations in the Bear population during that time, overall I feel the trend has been a general increase in Bear numbers in GMU 9D.

I would expect that the proposed longer seasons would result in a slight increase in the Bear harvest.

My personal observations lead me to believe that a SLIGHT increase in the Bear harvest is biologically sound and sustainable without degrading the trophy quality of Bears or the hunter's experience.

Additionally, due to the challenging weather conditions on the Alaska Peninsula, I believe that a slightly longer Bear season would also be beneficial from a safety standpoint. Most hunts on the Alaska Peninsula rely on small aircraft for support. A slightly longer season will allow more flexibility in determining when flights can safely be made. This is particularly important during the Fall season.

If the Board feels that an increase in the length of the season is not justified, I would ask that the Board consider keeping the October season at the same 15 day length but change the season dates to October 1 through October 15.

Thank you for considering my comments.

2025 Board of Game Central & Southwest Region Meeting

Proposal #14

I SUPPORT Proposal #14.

I hold Alaska Master Guide License #94 and have conducted Brown Bear hunts in

GMU 9D for more than 40 years. Although there may have been slight fluctuations in the Bear population during that time, overall I feel the trend has been a general increase in Bear numbers in GMU 9D.

I would expect that the proposed longer seasons would result in a slight increase in the Bear harvest.

My personal observations lead me to believe that a SLIGHT increase in the Bear harvest is biologically sound and sustainable without degrading the trophy quality of Bears or the hunter's experience.

Additionally, due to the challenging weather conditions on the Alaska Peninsula, I believe that a slightly longer Bear season would also be beneficial from a safety standpoint. Most hunts on the Alaska Peninsula rely on small aircraft for support. A slightly longer season will allow more flexibility in determining when flights can safely be made. This is particularly important during the Fall season.

If the Board feels that an increase in the length of the season is not justified, I would ask that the Board consider keeping the October season at the same 15 day length but change the season dates to October 1 through October 15.

Thank you for considering my comments.

2025 Board of Game Central & Southwest Region Meeting

Proposal #16

I SUPPORT Proposal #16.

I hold Alaska Master Guide License #94 and have conducted Brown Bear hunts in

GMU 9D for more than 40 years. Although there may have been slight fluctuations in the Bear population during that time, overall I feel the trend has been a general increase in Bear numbers in GMU 9D.

I would expect that the proposed longer seasons would result in a slight increase in the Bear harvest.

My personal observations lead me to believe that a SLIGHT increase in the Bear harvest is biologically sound and sustainable without degrading the trophy quality of Bears or the hunter's experience.

Additionally, due to the challenging weather conditions on the Alaska Peninsula, I believe that a slightly longer Bear season would also be beneficial from a safety standpoint. Most hunts on the Alaska Peninsula rely on small aircraft for support. A slightly longer season will allow more flexibility in determining when flights can safely be made. This is particularly important during the Fall season.

If the Board feels that an increase in the length of the season is not justified, I would ask that the Board consider keeping the October season at the same 15 day length but change the season dates to October 1 through October 15.

Thank you for considering my comments.

2025 Board of Game Central & Southwest Region Meeting

Proposal #15

I SUPPORT Proposal #15.

I hold Alaska Master Guide License #94 and have conducted Brown Bear hunts in

GMU 9D for more than 40 years. Although there may have been slight fluctuations in the Bear population during that time, overall I feel the trend has been a general increase in Bear numbers in GMU 9D.

I would expect that the proposed longer season would result in a slight increase in the Bear harvest.

My personal observations lead me to believe that a SLIGHT increase in the Bear harvest is biologically sound and sustainable without degrading the trophy quality of Bears or the hunter's experience.

Additionally, due to the challenging weather conditions on the Alaska Peninsula, I believe that a slightly longer Bear season would also be beneficial from a safety standpoint. Most hunts on the Alaska Peninsula rely on small aircraft for support. A slightly longer season will allow more flexibility in determining when flights can safely be made.

Thank you for considering my comments.

PC124

Name: Erin Gutish

Community of Residence: Indiana

Comment:

I strongly oppose the outrageous request to remove the majority of the brown bear population in Unit 16 stated in Proposal 17. I also oppose the proposal as it calls for the removal of large swaths of other species, such as black bears and wolves. This region and its wild inhabitants should be protected from governmental overreach.

PC125

Name: Jeanne Hale

Community of Residence: greater Palmer

Comment:

proposal 82

I feel it's long past time to put set backs on trappers near trails. Every year we hear horror stories involving traps and snares off popular use public trails. In an urban area, there really is o need or place for trapping and snaring.

Comments on Proposal 10 – 5 AAC 85.020, Seasons and bag limits for brown bears. Close nonresident brown bear season in Unit 9A

From: Wayne Hall, Anchorage, representing myself

First, by what authority does the Board of Game/ADFG substantially and fraudulently change a proposal, my proposal, that was properly submitted on a timely basis? Proposal 10 as it is now published represents very little of the proposal I submitted on April 24, 2024. Though not labeled as such, most of what was published is opinion of BOG/ADFG staff and was not any part of my proposal. My proposal was submitted as a .pdf file and any changes to it had to be intentional.

Specifically, all of the "What would be the effect if the Proposal were adopted?" section was constructed completely by BOG/ADFG staff using my name and misrepresenting my position. None of it was any part of my proposal, particularly the BOG/ADFG opinion statements "By eliminating nonresident hunting opportunity in Unit 9A there would be an unnecessary loss of hunting opportunity. There are no conservation concerns for brown bear in Unit 9A." Those are completely BOG/ADFG comments, not mine, and could only be intended to mislead the public. I would not submit a proposal if I thought there were "no conservation concerns" or if I thought it was "unnecessary" in any way. In fact, my proposal would increase the opportunity for resident hunters. They would not have to compete with the permanent hunting camp operations of the professional guiding industry established in GMU 9A.

For the record, here is the part of my proposal completely omitted by ADFG:

"What is the issue you would like the board to address and why? The brown bear population in the small portion of GMU 9A open to hunting is small, under likely significant hunting pressure. The GMU 9A hunting season should be closed to nonresidents in all Regulatory Years, odd and even, to protect that resource while still providing opportunity to residents. ADFG data on the number of permittees who reported hunting indicates increasing hunting pressure RY2011-RY2017 in GMU 9A, though it is decreasing in GMU9 as a whole. Contrary to GMU 9 as a whole, GMU 9A reported brown bear kills have been increasing RY2011- RY2017. ADFG has conducted no GMU9 brown bear population or density surveys in recent decades. More analysis and information will be provided in proposal commentary when more data and reports might be available from ADFG. No published summary harvest data is yet available from the Fall 2023 hunt and the Spring 2024 hunt will occur well after the deadline for these proposals. Overall, since RY2011, ADFG registration permit data indicates the number of hunters in GMU 9 has been declining. The number of GMU9 permittees who reported hunting in RY2017 was substantially lower, less than half (48.5%) of those who reported hunting in RY2011. Similarly, reported RY2011-RY2017 harvests for GMU 9 have been declining with the RY2017 reported harvest only 39.5% of RY2011 reported harvest. But contrary to GMU 9 overall, in GMU 9A the number of permittees who reported hunting in RY2017 was substantially higher, an increase of 173.4% over those who reported hunting in GMU 9A in RY2011. Similarly, and also contrary to GMU 9 as a whole, GMU 9A reported harvest in RY2017 was substantially higher, up 157.5% from the RY2011 reported harvest. These ADFG permit and harvest data for GMU 9A indicate increasing hunting pressure and harvest in the small portion of GMU 9A open to hunting."

ADFG did not comment on any of these facts. And since they were deleted by BOG/ADFG, no one else can either.

Further misleading to the public is the ADFG-authored "Background" section. They inaccurately claim "Based on the abundance estimate for Unit 9A by Lake Clark National Park biologists in 2003, 31.6 bears represent a harvest rate of approximately 3.8–5.6% for a population ranging from 569 to 837 bears." But that Olson and

1Putera 2003 abundance estimate of 569-837 bears is not only 21 years old, it is also for an area of 7,380km^2, an area 33% larger than all of GMU 9A. That 569-837 abundance estimate is for an area considerably larger than the total GMU 9A area used by ADFG, 5,556km^2, in calculating their misleading harvest rate for GMU 9A. If ADFG adjusted the 2003 population estimate to reflect only that portion of the population within GMU 9A, the real estimated harvest rates would be considerably higher than their claimed 3.8-5.6%. And it would be higher still if they adjusted the population estimate to reflect the area of GMU 9A actually open to hunting. Below is the table, supplied by ADFG in 2021, which shows the complete data used for GMU 9A brown bear population estimates. The second line of the data shows the area and population estimates, 7,380km^2 and 569-837 bears, published by Olson and Putera based on their 2003 surveys as misused by ADFG in their comments on this proposal.

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

				Area	Abundance		Density		
Year(s)	GMU	Method	Study areaa	km2	estimate	range	/1000 km2	Range	Sourcec
2003	9A	DCDS	9A	5,686	693	595-791	122	105-139	Quang 2005
		DCDS	9A	7,380	703	569-837	95	77-113	Olson and Putera (2007)
2003	9A	DCDS	LACL only	3,179	367	244-490	115	76-154	Quang 2005
		DCDS	LACL only	3,846	466	234-698	121	60-181	Olson and Putera (2007)
		BDS	LACL only	4,677	410	-	88	78-100	Schmidt et. al. (2017)

(Note: There were several apparent math errors in the Density/1,000km^2 calculations in the above table. The mathematically correct numbers are shown in red.)

Not only does ADFG have no recent population studies of their own, they are misrepresenting the results of studies performed by Lake Clark National Park biologists

Furthermore, in the section actually labeled “Department Comments” on Proposal 10, ADFG states “There are currently no conservation issues with brown bears in Unit 9A with the extensive refugia provided by Lake Clark National Park and McNeil River State Game Refuge and Sanctuary.” This confirms that brown bears otherwise protected in the adjacent National Parks and McNeil State Sanctuary and Refuge, and serving the interests of thousands of bear viewers, are being killed by mostly nonresident sport hunters for the benefit of professional guiding industry special interests and to the detriment of the much larger bear viewing population.

In spite of Alaska Public Records Act requests, ADFG has refused to provide detailed harvest data for the Fall 2023 and Spring 2024 GMU9 brown bear hunts, by subunit, on a timely basis for independent analysis and commentary on proposals before the Board of Game.

Recognizing that public comments will realistically have no impact on what ADFG proposes or supports, at least for the record, I support Proposal 10 as originally submitted, without the BOG/ADFG manipulation.

Wayne Hall, Anchorage, representing myself

Additional comments to the Alaska Board of Game

Submitted by: Wayne Hall, Anchorage, representing myself

Proposal 9 **OPPOSED**

If the harvest of adult females has increased during the period of reduced season length it is just as likely that, given harvests of in excess of 70% males, there are fewer adult males remaining in the population. Furthermore, it is the responsibility of the BOG/ADFG to manage wildlife, not to provide for the safety and comfort of hunters. That is the responsibility of the guiding industry and individual hunters. Neither is it the responsibility of the BOG/ADFG to generate more revenue for anyone.

Proposal 11 **SUPPORT**

This would reduce conflicts and support non-consumptive use in areas within and adjacent to National Parks and Preserves.

Proposal 12 **OPPOSED**

Neither is there statistical evidence presented to support increasing the season for these two subunits. There have been no surveys in decades to even establish the population status of any GMU9 subunit.

Proposal 13 **OPPOSED**

There is no statistical evidence presented to suggest increasing the season for these two subunits. There have been no surveys in decades to even establish the population status of any GMU9 subunit. If "we are seeing many more sows with cubs and young bears these days" it is just as likely adult males are already being overharvested.

Proposal 14 **OPPOSED**

There is no statistical evidence presented that the bear population is doing great or to support increasing the season for these two subunits. There have been no surveys in decades to even establish the population status of any GMU9 subunit.

Proposal 15 **OPPOSED**

There is no statistical evidence presented to suggest increasing the season for these two subunits. There have been no surveys in decades to even establish the population status of any GMU9 subunit. It is the responsibility of the BOG/ADFG to manage wildlife, not to provide for the safety and comfort of hunters and provide revenue to guides and outfitters.

Proposal 16 **OPPOSED**

There is no statistical evidence presented to support the claim of a healthy brown bear population or support increasing the season for these two subunits. There have been no surveys in decades to even establish the population status of any GMU9 subunit. It is the responsibility of the BOG/ADFG to manage wildlife, not to provide for the safety and comfort of hunters and provide revenue to guides and outfitters.

Proposal 17 **OPPOSED**

No evidence is presented that "the brown bear population in Unit 9E has been increasing the last eight – ten years". There have been no surveys in decades to even establish the population status of any GMU9 subunit.

Proposal 18 **SUPPORT**

This proposal supports non-consumptive use, primarily bear-viewing, for a large and growing number of visitors, both residents and non-residents. There have been no brown bear population surveys in decades for any of the GMU9 subunits. Shortening the seasons in in Unit 9C and establishing a drawing permit hunt will conserve the numbers of brown bears in the area and in National Parks and Preserves where the preferred use is overwhelmingly non-consumptive.

Proposal 29 **SUPPORT**

Population objectives for the extreme measures of predator control, including aerial shooting of bears and wolves, require ongoing annual review and evaluation.

Proposal 75 **OPPOSED**

There is no scientific evidence to support any increase in moose harvest of these extreme measures. In practice, there is no effective monitoring programs designed to scientifically evaluate impacts on predator populations or identify causal relationships between predator control and pre-population dynamics. ADFG should not be authorized to develop a plan for aerial shooting of wolves and bears that is not subject to prior public scrutiny. ADFG should define what is included under "ground-based lethal removal". Does that include the use of poison and other egregious killing of pups and cubs in their dens? This program will also have an impact wolf and bear populations within adjacent Denali National Park boundaries.

Proposal 82 **SUPPORT**

This proposal should have been adopted in 2022. Subsequent meetings among non-trappers and trappers resulted in agreement on the setback locations and other conditions. Adopting this will reduce accidental trapping incidents with recreational users and their dogs.

PC127

Name: Dustin Hannafious

Community of Residence: Anchorage

Comment:

I am opposed to proposals 51 and 52.

Harvest data shows that there is surplus of legal rams in this area (9+ year old sheep are harvested every year). It doesn't make sense to eliminate nonresident opportunities when this area is already open to residents via an over the counter harvest ticket. Historical data provided by ADF&G shows that the annual number of people hunting MacColl ridge (resident and nonresident hunters combined) from 2010 to 2023 is 5. The number of full curl rams that were observed during the aerial survey in 2023 was 8. The data shows that sheep numbers on MacColl ridge can support the historical hunting pressure and still leave legal rams on the mountain every year. There is no game management reason to approve either of these proposals.

PC128

Name: James Hardegree

Community of Residence: Wasilla[3]

Comment:

I support Proposal 70 and Proposal 3 by Caleb Martin.

PC129

Name: Wayne Harper

Community of Residence: Wasilla

Comment:

I believe that it is the duty of fish and game to provide maximum opportunity for hunters when available. If brown bear seasons can be extended providing hunters more opportunity while the bear population can support it, then I believe the season should be extended.

PC130

Name: Laura Hathaway

Community of Residence: Hillsborough

Comment:

I oppose Prop 33 and the legalization of killing wolves. Wolves are an integral part of nature and the environment. Leave them alone to live their lives away from human hatred and senseless killing.

PC131

Name: Alex Hedman

Community of Residence: Eagle River

Comment:

75 - I oppose this proposal. Aerial gunning is an expensive and ineffective management tool, and in this case would be a slippery slope to further aerial "management" options. Alaska is known for its wilderness, the Last Frontier. Wolves have just as much right to be on the land as the moose do. Some places need to be left wild, particularly this close to iconic Denali N.P. Additionally, the cost-burden to the State of Alaska of this proposal would not achieve the desired effects, and would only serve to drain already underfunded state coffers.

76 - I oppose same day hunting with aircraft. The nominal 300' rule is ridiculous as aerial spotting and landing zone identification do not support Fair Chase principals and tilt the probability of success unfairly in the direction of the hunter. The brown bear is an iconic symbol of Alaska and the hunting of brown bear should be above reproach. Do not allow aerial sighting and same day hunting.

PC132

Name: Glenn Helmuth

Community of Residence: Wasilla

Comment:

Proposal 70. The moose populations in these area's not as strong as they once were and the bear populations have increased, extending the bear hunting season will hopefully start to control bear populations and help increase moose populations. I support proposal 70. Proposal 3, I totally support the use of cell cameras for bear baiting/hunting, it's not as easy as people think but it is a useful tool to help control the bear populations where it is high. One of the biggest challenges is enforcement as the law is now, troopers in the field all say there is a grey area in the law, some say use the airplane rule, some say no cell cameras at all, so a new law allowing the use of cell cameras would definitely make it clear, I support proposal 3

Submitted by: Johnny Helton
Community of Residence: California
Comment: I support prop 9

" Support Proposition 9"

Regarding the Proposal to extend Brown Bear season.

I would like to give my 2 cents worth, assistant guide # 7233.

First of all I love hunting these animals and being in the country that they live in, and I count it a privilege to get the opportunity to chase them every year.

Point 1. Logistics have changed for the worst.
When I first started it was 21 days long
and I would show up usually 2 days before season starts, now sometimes I have to get there 5 days early to just get a airplane ride down to where we are hunting. And even after we are done sometimes it can

take a few days to get out, because of so many people trying to get a seat on one of the few airplanes that fly back and forth to the Peninsula.

Point 2. I miss getting to be around the fellow guides.
We used to be able to sit around with the handful of the same guides and talk and catch up before and in-between if you killed out early and after the hunts. Now because everything is so jammed up with one hunting slot and new guides coming and going every year, often times we don't even see each other, I miss that.

Point 3. The Money.

Yeah i do it because I love it, but I make half of what I used to make with not much time difference from being away from

home because of the extra days you lose do to the logistics .

So as a 15 year guide I strongly urge and support extending the season back to 21 days, the same amount of bears are usually killed either way, and in my 15 years of hunting in GMU 9, I haven't seen any difference in the amount of bears from when i started until now..

Thank you for your time.

Johnny Helton. # 7233

PC134

Name: Lora Herring

Community of Residence: Austin, TX

Comment:

I strongly oppose #75

And support #11, #29, and #82

Thank you and keep Alaska a wonderful place to visit

PC135

Name: Malcolm Herstand

Community of Residence: Girdwood

Comment:

I am writing comments for several proposals as a resident, hunter, and co-owner of a wilderness backpacking guide company.

Proposal 2: expanding bear baiting seasons in units 9, 11, 13, 14A&B, 16, and 17 — No. Expanding bear bait opportunities in units 13, 14 and 16 is a poor idea, these units are urbanizing and have a high density of hunters, other recreational users, and remote properties. Few people are likely to enjoy the opportunities of this proposal, and many more people could see more negative bear-human interactions.

Proposal 3: allow the use of cellular cameras for taking bear over bait — No. This creates a challenge for Alaska Wildlife Troopers to enforce. Bear baiting stations should not be made any easier of an opportunity than they already are.

Proposal 34 and 76: same day airborne take for bears/wolves in units 16 and 17 — No. Same day take makes for unsafe flying, more low and disruptive flying during hunting seasons, is hard to enforce (including hard for other hunters to know if regs are being followed) and these areas do not need more hunt opportunities for bear and wolves, both of which have high value for the tourism area in 16 and 17.

Proposal 59+60: lengthen wolf and coyote trapping season in unit 11 — No. Complicates regs and trapping during the shoulder seasons is more likely to result in breakup or fall storms preventing timely access to traps. Trapping needs more restrictions as other users increase, not less.

Proposal 79: extend wolf trapping season to April 30 — No. There are already increasing amounts of conflict between hunters and non-consumptive land users in Unit 14, and wolves are a valuable part of the local economy and ecosystem.

Proposal 81 and 82: Increase trap check frequency and limit placements — Yes. In unit 14 and in the MatSu Borough trapping should be made more regulated in several ways. While these may be hard to enforce they encourage only the most dedicated and ethical trapping in this highly-used area.

Proposal 75: ADFG removal of bears and wolves from unit 16 — No! ADFG predator removal is costly and ineffective. High snow years is the real issue with moose populations in unit 16. The edges of unit 16 include many high tourism areas where tourists pay very large amounts of money for the opportunity to see wolves and bears. ADFG predator control proposals need to be put on hold, neither science nor economics supports these actions.

Written Comments to Board of Game January 2025 Central Southwest Region

I take this opportunity to provide you with comments on proposals specific to Game Management Unit (GMU) 13.

My name is Michelle Heun. I am the owner/operator of High Lake Lodge located in GMU 13E, and I am a licensed Transporter (1063). I live at the lodge from late May through October, and in the off season call Palmer home. I am a member of the Matanuska Valley Fish and Game Advisory Committee, but these comments are solely my own and do not reflect those of the committee.

High Lake Lodge was homesteaded in 1959. My family has owned High Lake Lodge for over three decades. High Lake Lodge is not accessible by any state road system, waterway, or state or federally maintained airport; it is accessible by air only by our private airstrip and by floatplane on the lake, which is boarded by state and federal land, some of which is in the process of being transferred to native property. As caretakers of this land, we take our responsibility very seriously.

The last several years have been challenging for our business, such as the most recent spruce bark beetle infestation, Rusty Tussock caterpillar infestations, and the closing of the Nelchina caribou hunts. My family fully supported the closure of the Nelchina caribou hunt, as did our returning resident hunters.

While the Nelchina caribou closure was both anticipated and supported by my family, the decline in legally harvestable moose has been noticeable. I regularly communicate with the area biologist on game and habitat conditions in our area. Department proposals potentially impact my family's business in Unit 13E, but I am in support of seeing the game populations increase and objectives met.

SUPPORT Proposals 42, 48, and 63

***Proposal 42, department data shows the current harvest objectives are not attainable as demonstrated by the harvest history of the herd. This proposal just makes sense;**
***Proposal 48, this is a great tool for the area biologists to have the direction and ability to implement wolf control; and**
***Proposal 63, I support this as a proven method to collect data. We have not seen as many ptarmigans in the last several years, and I can support the need for more collected data.**

OPPOSE Proposals 45, 46, 47, and 49

***Proposal 45, hunters can already participate with others in the general season;**
***Proposal 46, lacks specifics;**
***Proposal 47, not necessary to add an archery hunt when hunters presently have a choice on their preferred weapon; and**
***Proposal 49, adamantly opposed to this. There is no justification to eliminate the harvest of the Nelchina caribou and Alaskans are already up against federal subsistence proposals to close units and areas.**

Respectfully Submitted,
Michelle Heun, Owner/Operator
High Lake Lodge, Inc.
HighLakeLodge@gmail.com
[redacted]

PC137

Name: Drew Hilterbrand

Community of Residence: Ninilchik

Comment:

Proposal 2- I am opposed to this proposal on the grounds that it could very well create a serious conflict with fall hunting seasons. Particularly moose season, but it could very well create conflict with fall brown bear seasons when brown bears are drawn to baits. This could also result in illegal take of brown bears over bait with a bait site operator taking a brown bear at a bait site but reporting otherwise, in areas that have fall brown bear seasons open.

Proposal 3- I am opposed to this proposal simply for the fact that it promotes an absence from time in the field and active participation in the hunting experience as a whole. The argument can be made that bear baiting is not fair chase but the fact is that it still encourages hunters to spend time in the field actively running baits and sitting on their stands and in blinds. This would simply encourage some to remain at home until their phone gets a ping and then go sit in their stand or check their bait.

It is argued that this would be no different than same day airborne hunting of baits but the fact remains that even in areas where same day airborne hunting over baits is allowed it still requires the active participation of hunters. They must still spend time and effort in the field just to check on the baits and see if they are active.

It must also be pointed out that while cell service is limited in many areas at present, the time is coming in the not too distant future when satellite data transfer to personal devices will be the norm.

In my opinion the only way cellular cameras should be allowed would be in predator management areas, but certainly not state wide.

Proposal 9- I support what I believe to be the intent of this proposal, if adopted it should be amended to preserve the Sept.20 season opener in 9B which has a history of customary and traditional use of brown bears.

Proposal 10- I am strongly opposed to this proposal. It is nothing but a thinly veiled attempt by anti hunting and wildlife viewing interests to restrict and eliminate sustainable hunting opportunities. The majority of 9A is McNeil River Sanctuary/Refuge and a portion of Lake Clark National Park which is closed to ALL hunting and/or brown bear hunting.

Brown bears have very large home ranges. To suggest that the brown bear population in the small hunt able portion of 9A is in danger of over harvest when the bear population in the whole of the protected portion is very healthy is simply ignorant and narrow minded.

I can attest that having spent 23 years in 9A guiding hunters, wildlife viewers, fisherman, and trapping I know much of it intimately and the brown bear population at present is extremely healthy with good numbers and all age classes of bears present.

Proposal 11- I wholly oppose this proposal simply for the fact that it attempts to place the desires of one user group over another without regard for the sustainability of the resource. There is no evidence to suggest that the bear population is in distress or being over harvested which would be the only legitimate reason for shortening the bear seasons. The spring/fall bear hunting seasons are already relatively short

when compared to the 4+ months that wildlife viewers and fisherman have to enjoy the rivers and bear habitat of 9C.

It is also suggested that hunting bears in areas of human presence is unethical once they have become habituated. I personally believe the greater issue is habituating wildlife to humans and the public safety concerns that it presents when bears and other wildlife begin to become all too familiar with the continued presence of humans in their habitat.

Proposal 12thru17- I support the lengthening of fall brown bear season in 9D,E to align with 9A,C. Recent observation suggests that the bear population is healthy both in numbers and the overall span of all age classes of bears. Lengthening the season would alleviate some of the pressures and logistical problems that weather can present, particularly in this area.

Proposal 18- I am opposed to this proposal as it would severely limit hunting opportunities for brown bear in 9C, a subunit that already has many protect areas that are closed to hunting. This would simply further restrict hunting opportunity when there is no evidence that the bear population in this area is in distress or on the decline.

The individual that wrote this proposal suggests that the age class of mature males is in decline or missing based upon the observation of bear viewing guides and clients. It has been my observation that in areas of high and continued uncontrolled/unlimited human presence (as is often the case in many bear viewing areas) that mature male bears often leave these areas after the rut takes place in the spring preferring "less busy" locations. This could very easily account for the apparent lack of mature males. It also must be taken into account that seasonal and annual changes in food sources can affect the numbers of bears observed in limited areas and time frames. The overall observations of myself and others do not support these claims, and the bear population as a whole appears very healthy through out 9C particularly when flying and observing outside the primary traffic areas of wildlife viewers. Suggesting the implementation of a draw permit restriction for this area is ridiculous.

PC138

Name: Nanda Hines-Currant

Community of Residence: Watsonville, California

Comment:

11,59,75,79-All of these proposals are dangerous, inaccurate reasons and unnecessary means to destroy Wolves. These are proposals that are not moving in a direction to protect and respect an important species and will only add to the issues we face with climate and loss of healthy ecosystems in our country.These proposals hold no value for Alaska and their important wolf population.

PC139

Name: Karin Holser

Community of Residence: Homer, AK

Comment:

Proposal 19 (hunting) and Proposal 20 (trapping)

I would like to comment on Proposal 19 (hunting) and Proposal 20 (trapping). I use to live on the Pribilof Islands for over 20 years and still have a cabin on St. George Island. I would agree with the assessment that the Pribilof arctic fox population is declining and needs to be given as much protection as possible. I have seen "off-Islanders" shooting any and every fox they see, because unfortunately many do not understand that these are not introduced like on the Aleutian chain. Even after informing someone that they are native, there is no mechanism to stop them because there are no bag limits or closed seasons. So I highly recommend that ADF&G adopt these two proposals, so that we can help slow down the decline of the Pribilof arctic fox.

PC140

Name: Jeff Chadd

Community of Residence: Forsyth, Montana

Comment:

Proposal 18 Comments

There is no biological data to support this kind of change to the season and harvest of bears by drawing permit only. Hunting is allowed in the Preserve only, and the fishing and bear viewing users can go into the hard Park where hunting in not allowed, that would solve any possible need to change the hunting season and harvest of bears.

In the last 10 years the number of bear viewing and fishing lodge users in the Katmai Preserve has grown exponentially. They utilize the Preserve the months of June – September for bear viewing and fishermen whereas the hunters only have 21 day season in October with very small number of user days.

The reason the bear viewing guides are seeing a possible decline in the numbers of mature male bears is because of the pressure put on the bears by the bear viewers and fishing lodges. Mature boars are not stupid and will vacate high pressure areas for more remote regions. The hunters have very little impact on the bear population whereas the bear viewers and fishing lodges in their large numbers of users and days in the field have a greater impact on the habituating the bear population to human presence.

In addressing the economic contribution to Southcentral Alaska, hunters and their guides also provide economic benefits to the villages, town, cities and the State.

“This sustainable economic activity is at risk, as well as the educational and inspirational opportunities provided by this unique bear viewing experience.”

The above statement from Proposal 18, is hard to understand because 75% of Unit 9C is hard Park and hunters are not allowed to hunt there. How is the sustainable economic activity at risk? and what difference will changing the season and making it a drawing permit affect this activity? There is no risk, the hunting users are utilizing the Preserve only for a 3 week season, whereas the bear viewing users and fishing lodge users have at least 3 months to utilize the Katmai Park and Preserve.

PC141

Name: Kari Hooker

Community of Residence: California

Comment:

Opposition to Proposal 75: I have been a visitor to the beautiful state of Alaska. One of the main reasons I came was to have the opportunity to see the natural world in uninhibited splendor. When I came, I had no idea Alaskans had the desire to hunt down and kills animals who are native to their lands. This makes no sense, from both a moral and scientific standpoint. We are the interlopers...not the wolf...not the bears...not the moose. I could go on and on. I cannot understand how I live in a country where humans feel they have the right to intervene by killing animals who belong in natural animal habitats. How is aerial gunning being considered? What scientific evidence backs this up? How can humans be so selfish and egocentric? We did our best to bring back species that we tried to eliminate, to once again go after them through no fault of their own...and for what? For hunters? Am I not important as a visitor who wishes to come to a state that protects its predators...and its prey by letting them live naturally in the land they belong? Please...Proposal 75 must be stopped! Alaska's predator control programs — aimed at boosting moose, caribou, and deer populations for hunters — do not work to increase human moose harvest. Previous studies have found no increase in moose harvests in the years following nearly 40 years of predator control in South Central Alaska. Hunters do not deserve special laws that give them more access to overabundant moose. I cannot visit your state if this proposal passes. I want to see animals protected...not gunned down in violent and senseless acts.

However, I do support Proposal 82. A 50-yard trapping setback along specific trails in the area, particularly ones that are heavily used for recreational purposes, must be set. These trapping setbacks would help keep dogs and people safe from incidental trapping.

PC142

Name: Graydon Horan

Community of Residence: Eagle River

Comment:

I am in support of proposals 70 and 3. I have property in the Talkeetna area and the brown bears don't show up until the end of may beginning of June where I hunt. So adding a few weeks would help with the ability to keep the population of brown bears in control around my cabin. As for proposals 3. Allowing the use of cell devices for bear hunting would make it safer to approach a bait station. Thank you for your time.

PC143

Name: Marilyn Houser

Community of Residence: Anchorage

Comment:

Proposal 10: I SUPPORT this proposal which would close brown bear hunting to non-residents in Unit 9A. There is considerable bear viewing in this unit so bears are habituated to people and human activity. Eliminating non-resident hunting would alleviate some of the hunting pressure on this vulnerable population. Residents of Homer who have visited this side of Cook Inlet for years note the significant decrease in the number of bears observed.

Proposal 11: I SUPPORT this proposal which would shorten the spring and fall brown bear hunting seasons in Unit 9C by one week for residents and nonresidents. Again, this is an area where bear viewing is immensely popular so the bears are habituated to people and human activity. Photographers, film crews and other visitors pay thousands of dollars per day to view and photograph these bears. Guides and visitors know many of the bears as individuals. ADFG has said, "The department and Board of Game have for decades supported short seasons and reduced bag limits for nonresident and resident hunters in Unit 9 for bear conservation and hunt quality. ' It makes sense to shorten the seasons to alleviate the hunting pressure on this vulnerable population.

Proposal 29: I SUPPORT this proposal which require ADFG to review the population and harvest objectives for the Mulchatna caribou herd. The current intensive management of predators in an effort to increase the caribou population to 30,000 – 80,000 animals is untenable. It completely ignores how many caribou the habitat can support, disease, and a myriad other variables. Climate change is having a major impact all across Alaska. Even the ADFG commissioner has acknowledged the current program at least provides the appearance of doing something since the department cannot control disease and habitat degradation caused by a changing climate. This makes the indiscriminate, mass killing of bears and wolves even more unacceptable.

Proposal 75: I OPPOSE this proposal by ADFG to add active ADFG participation in the removal of wolves, brown bears, and black bears in Unit 16 Intensive Management. It would allow department employees to conduct aerial, land and shoot, or ground-based lethal removal of wolves, black bears and brown bears using state-owned, privately-owned, or chartered equipment, including helicopters. This is an attempt by ADFG to enact the same program that currently is in place in the Mulchatna area, which is unacceptable. There is no end date. The department comments say there is no plan to activate bear control at this time. But this would be in regulation, as a place holder, so bear control can be started up without justification, perhaps to address a situation caused by department mismanagement. That hardly seems like scientific management and all Alaskans expect better. I also have to ask in a time of shrinking revenue, where is ADFG getting the funds to fly/hire helicopters and fixed winged aircraft?? And using ADFG staff is not without cost; their time would be better spent doing population surveys and research than the mass killing of predators.

Proposal 75: I OPPOSE this proposal by ADFG to add active ADFG participation in the removal of wolves, brown bears, and black bears in Unit 16 Intensive Management. It would allow department employees to conduct aerial, land and shoot, or ground-based lethal removal of wolves, black bears and brown bears using state-owned, privately-owned, or chartered equipment, including helicopters. This is an attempt by ADFG to enact the same program that currently is in place in the Mulchatna area, which is

unacceptable. There is no end date. The department comments say there is no plan to activate bear control at this time. But this would be in regulation, as a place holder, so bear control can be started up without justification, perhaps to address a situation caused by department mismanagement. That hardly seems like scientific management and all Alaskans expect better. I also have to ask in a time of shrinking revenue, where is ADFG getting the funds to fly/hire helicopters and fixed winged aircraft?? And using ADFG staff is not without cost; their time would be better spent doing population surveys and research than the mass killing of predators.

Proposal 82: I SUPPORT this proposal which would establish 50-yard trapping setbacks along specific trails in Unit 14. I have long supported such setbacks. Unit 14 encompasses one of the most densely populated areas in the state and it only makes sense to regulate where trapping can legally occur in the proximity of specific, heavily used trails. Such regulation is in the interest of public safety, the safety of people's pets and the enjoyment of trails by those simply out to recreate and enjoy nature. Frankly, I do not understand the opposition by trappers since their pursuit is viewed by most as a barbaric pursuit stuck in the dark ages and some regulation could improve trapping's public image.

Proposal 2: I OPPOSE this proposal which adds two bear baiting seasons in Units 9, 11, 13, 14B, 14C, 16, and 17 where bear baiting is already legal. Taking bears over bait has not always been legal in the 50 years I have lived in Alaska and it was a dark day when this became a legitimate way to kill bears.

Proposal 3: I OPPOSE this proposal which would allow the use of cellular cameras for the taking of black bear and brown bear over bait in Units 9, 11, 13, 14B, 16, and 17. Taking bears over bait has not always been legal in the 50 years I have lived in Alaska and it was a dark day when this became a legitimate way to kill bears. Now let's add technology to the mix. It is simply not acceptable.

Proposal 28: I SUPPORT this proposal which would reduce population and harvest objectives for moose in Unit 17B. If reasonable population and harvest numbers are in place then ADFG might not find justification for the implementation of Intensive Management of predators.

Proposal 30: I SUPPORT this proposal which would implement a three-year moratorium on caribou hunting in Units 17 and 19. Since these are GMU's where the Mulchatna caribou herd occurs, it only makes sense to suspend hunting where IM has been implemented.

Proposal 32: I OPPOSE this proposal which would allow the year-round take of brown bears in Unit 17. The recruitment of brown bears is low and there was a time when the regulations reflected this. How much pressure can brown bears take before they are extirpated from an area???

Proposal 33: I OPPOSE this proposal which would allow the same day airborne take of brown bear and wolves in Unit 17. I see no reason why hunters should be permitted to kill wolves and brown bears the same day as airborne in this GMU.

Proposal 34: I OPPOSE this proposal which would allow the same day airborne take of brown bear in Unit 17. I see no reason why hunters should be permitted to kill brown bears the same day as airborne in GMU 17. This appears to be a proposal submitted by a guide so it is self-serving and not in the interest of scientific management.

Proposal 35: I SUPPORT this proposal which would shorten the trapping seasons for wolverine in Units 9 and 17. Wolverines are a species with slow recruitment and are being impacted significantly by climate change. It makes sense to back off on the human pressure on wolverines.

Proposal 36: I SUPPORT this proposal which would shorten the hunting season for wolverine in Unit 17. Wolverines are a species with slow recruitment and are being impacted significantly by climate change. It makes sense to back off on the human pressure on wolverines.

Proposal 57: I OPPOSE this proposal which would Increase the hunting bag limit per regulatory year for brown bear in Unit 13. Brown bears are already heavily hunted in GMU 13. Perhaps a reduction in moose and caribou seasons would be more appropriate.

Proposal 58: I OPPOSE this proposal which would reduce the minimum wolf population to 100 in the Unit 13 Intensive Management Plan for wolves. This is a proposal that is just part of the never ending war on predators. The time is long past due to re-evaluate a realistic population objective for the Nelchina caribou herd and perhaps take seriously illegal harvest (poaching).

Proposal 59: I OPPOSE this proposal which would lengthen the wolf trapping season in Unit 11. Again, this is a proposal rooted in the never ending war on predators. We can't have wolves eating sheep, moose and caribou, can we?

Proposal 60: I OPPOSE this proposal which would lengthen the coyote trapping season in Unit 11. The justification for this proposal suggests more dead coyotes would mitigate predation on big game like sheep, moose and caribou. This is puzzling since coyotes primarily eat much smaller prey and carrion.

Proposals 61 and 63: I SUPPORT these proposals that address ptarmigan harvest in GMUs 13B and 13E. There is considerable hunting pressure on ptarmigan and bag limits are high for a small bird that is of marginal use for food. I know I see far fewer ptarmigan than I did 50 years ago.

Proposals 70, 71, 72, 76 and 77: I OPPOSE these proposals that all increase the take of black and brown bears in GMUs 14A, 14B and 16. Again, these proposals all reflect the never ending war on predators.

Proposal 79: I OPPPOSE this proposal which would extend the wolf trapping season in Unit 14A. The season is already long enough. It appears the author of the proposal already kills plenty of wolves and has issues with violence against women (see Facebook and Courtview Alaska).

Proposal 81: I SUPPORT this proposal which would require traps and snares set within two miles of publicly maintained roads in Unit 14A be checked at least every 36 hours. Most people feel trapping is from the dark ages and is inhumane. A requirement that traps be checked at least every 36 hours would go a long way in improving public perception.

PC144

Name: Natascha Howard

Community of Residence: Jacksonville, Florida

Comment:

Written response to the proposals of the ADFG

OPPOSING ALL EXCEPT:

Support with amendment 5, 6, 7 10, 18, 19, 20, 29, 65, 68, 69, 82

Name: Natascha Howard, Jacksonville, Florida Date:12/27/24

I'm writing in response to the recent proposals made by ADFG. Many of these proposals would harm Alaska's wildlife and disrupt the balance of the ecosystems. People travel from all over the world to see Alaska's wilderness areas and animals in their natural habitats. People travel to Alaska to watch brown bears and other animals. Please, protects them.

Oppose proposal 1: Reauthorize the brown bear tag fee exemptions.

This reduces income from the hunts needed to protect wildlife. Brown bear sows will have their first cub at age of maturity around 6 years old. They will only have a cub every 4 to 6 years. Only 33% of the cubs will live to grown into adult bears. Most cubs die by the hands of male bears. People pay to observe bears and support the local economy by flying into Anchorage and King Salmon, spending money on hotels and food.

Oppose proposal 2: Open two bear baiting seasons

Baiting bears with food is an unfair practice plus it causes more human-bear conflicts. Tourists pay good money to guides to observe bears, pay for bear watching flights and boat tours.

Oppose proposal 3: Allow the use of cellular cameras for bear hunting over bait.

This gives hunters an unfair advantage. Bear populations need to be protected.

Oppose proposal 4: Establish general season, archery only sheep hunts.

Overhunting sheep causes predators to look for food elsewhere, causing more human bear and human wolf conflicts.

Support with amendment proposal 5: Reduce the nonresident bag limit for caribou.

Non-residents should NOT be allowed to hunt caribou to protect the population. At the same time bear populations should be protected since they reproduce much more slowly and already suffer from high infanticide rates.

Support with amendment proposal 6: Shorten the nonresident hunting season for caribou in Unit 9D

Non-residents should NOT be allowed to hunt caribou to protect the population. At the same time bear populations should be protected since they reproduce much more slowly and already suffer from high infanticide rates.

Support with amendment proposal 7: Extend the fall Southern Alaska Peninsula caribou season for residents and nonresidents.

Non-residents should NOT be allowed to hunt caribou to protect the population

Oppose proposal 8: Clarify hunting feral reindeer in Unit 10, Umnak Island is allowed under the current caribou hunting regulations.

Let natural predators manage the reindeer population.

Oppose proposal 9: Lengthen the spring and fall brown bear hunting seasons in unit 9.

Overhunting bears could cause long term harm. They are slow to reproduce and infanticide already keeps the numbers low.

Support with amendment proposal 10: Close unit 9A to nonresident brown bear hunting.

Closing unit 9A to nonresident brown bear hunting is a good start, but bears need protection to keep their population stable due to slow reproduction rates and infanticide.

Support with amendment proposal 11: Shorten the spring and fall brown bear hunting seasons in unit 9C by one week for residents and nonresident.

Nonresidents should not be allowed to hunt bears to protect the population. Any hunting during critical times should be stopped, especially the hunting of bears with cubs as this will give the cubs a cruel and unusual punishment of a slow starving death.

Oppose PROPOSAL 12: Lengthen the fall brown bear hunting seasons in Units 9D and 9E for both residents and nonresidents.

Brown bear populations should be protected.

Oppose PROPOSAL 13: Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents, and lengthen the nonresident spring hunting season.

Brown bear populations should be protected.

Oppose PROPOSAL 14: Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Bear populations should be protected since they reproduce much more slowly and already suffer from high infanticide rates.

Oppose PROPOSAL 15: Lengthen the nonresident, spring brown bear hunting season in Units 9D and 9E

Nonresidents shouldn't be allowed to hunt brown bears to protect the slow growing population.

Oppose PROPOSAL 16: Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Bear populations should be protected since they reproduce much more slowly and already suffer from high infanticide rates.

Oppose PROPOSAL 17: Lengthen the spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Bear populations should be protected since they reproduce much more slowly and already suffer from high infanticide rates.

Support with amendment PROPOSAL 18: Shorten the spring and fall brown bear hunting seasons in Unit 9C for residents and nonresidents, and convert to drawing permit hunts. This is a small improvement, but stopping bear hunts completely would be better for their survival.

Support with amendment PROPOSAL 19: Establish a hunting season and nonresident bag limit for Arctic fox on the Pribilof Islands in Unit 10

Foxes take care of rodents.

Support with amendment PROPOSAL 20: Establish a nonresident bag limit on Arctic fox trapping on the Pribilof Islands in Unit 10

Protect the foxes, they catch rodents.

Oppose PROPOSAL 21: Remove the two per day bag limit for beaver when taken by firearm during April 15–May 31 in Unit 9

Beavers create wetlands many species depend on.

Oppose PROPOSAL 22: Shorten the season for hunting wolverine in Unit 9 for both residents and nonresidents

Wolverines help clean up the environment

Oppose PROPOSAL 23: Lengthen the nonresident hunting season for Emperor geese in Units 9 and 10, and increase the number of permits allocated to nonresident hunters

This would harm natural predators

Oppose PROPOSAL 24: Close the season for Alaska hares in Units 9 and 17 Dillingham Area – Unit 17 (13 proposals)

This would harm natural predators

Oppose PROPOSAL 25: Increase the number of moose drawing permits issued to nonresidents for Unit 17A

This would harm natural predators

Oppose PROPOSAL 26: Lengthen the nonresident, fall moose hunt in Unit 17A PROPOSAL 27: Reauthorize the antlerless moose season in Unit 17A

This would harm natural predators

Oppose PROPOSAL 28: Reduce population and harvest objectives for moose in Unit 17B

Support with amendment PROPOSAL 29: Review the population and harvest objectives for the Mulchatna caribou herd

Caribou herds need to be protected

Oppose PROPOSAL 30: Implement a three-year moratorium on caribou hunting in Units 9, 17 and 19

Oppose PROPOSAL 31: Close the resident caribou season in Units 9B, 17 and 19

OPPOSE PROPOSAL 32: Allow the year-round take of brown bear in Unit 17

This would wipe out the brown bear population with its slow reproduction rates.

OPPOSE PROPOSAL 33: Allow same day airborne take of brown bear and wolves

UNFAIR AND CRUEL, UNETHICAL. Disruptive to wildlife and would wipe out the ecosystem

OPPOSE Unit 17 PROPOSAL 34: Allow the same day take of brown bear in Unit 17

UNFAIR AND CRUEL, UNETHICAL. Disruptive to wildlife and would wipe out the ecosystem

Support PROPOSAL 35: Shorten the trapping seasons for wolverine in Units 9 and 17, to the last day of February

Wolverines help clean up the environment

Support PROPOSAL 36: Shorten the hunting season for wolverine in Unit 17

Oppose PROPOSAL 37: Remove the two per day bag limit for beaver when taken by firearm and allow the use of firearm from October 10 – May 31 in Unit 17

Beavers create wetlands and this would also harm natural predators.

Oppose PROPOSAL 38: Lengthen the permit dates to access Walrus Island State Game Sanctuary for hunting Glennallen Area –

This is a sanctuary and defeats the purpose of a sanctuary

OPPOSE PROPOSALS 39- 45 Moose are a key food source for bears and wolves, leading to ecosystem imbalances

Oppose Proposal 39: Reduce population and harvest objectives for moose in Unit 13B

Oppose PROPOSAL 40: Change the population objective for moose in Unit 13C

Oppose PROPOSAL 41: Reduce harvest objectives for moose in Unit 13C

Oppose PROPOSAL 42: Reduce harvest objectives for moose in Unit 13E

Oppose PROPOSAL 43: Establish an antlerless moose season in Unit 13A

Oppose PROPOSAL 44: Establish an antlerless moose season in Unit 13C

Oppose PROPOSAL 45: Add a five-day archery only season for hunting moose in Unit 13

Oppose Proposals 46-50 Hunting moose, caribou and sheep, it affects their natural predators

Oppose PROPOSAL 46: Change the Unit 13 community subsistence moose hunt to a registration hunt with additional conditions and restrictions

Oppose PROPOSAL 47: Open a late season archery only drawing permit hunt for any bull moose in Units 13E and 13B, along the Denali Highway

Oppose PROPOSAL 48: Modify the intensive management plan for Unit 13 to include Nelchina caribou

Oppose PROPOSAL 49: Eliminate the harvest of Nelchina caribou

Oppose PROPOSAL 50: Change the sheep draw hunt DS165 in Unit 13D to a general season hunt

Oppose Proposal 51-56 Hunting sheep and goats, it affects their natural predators.

Oppose PROPOSAL 51: Open a resident only sheep hunt in the Chitina River drainage in Unit 11

Oppose PROPOSAL 52: Create a new management area around MacColl Ridge in Unit 11, open to resident sheep hunting by registration permit only

Oppose PROPOSAL 53: Establish a resident, archery only sheep drawing hunt in Unit 13D

Oppose PROPOSAL 54: Change the bag limit for the Unit 13D sheep drawing hunts, DS160 and DS260

Oppose PROPOSAL 55: Divide the goat drawing permit hunt DG720 into three separate permit hunts

Oppose PROPOSAL 56: Establish an archery only registration goat hunt in Units 13D and 11

OPPOSE PROPOSAL 57: Increase the bag limit for brown bear in Unit 13

Oppose PROPOSAL 58: Reduce the minimum wolf population in the Unit 13 Intensive Management Plan for wolves

Wolves take care of smaller animal populations

Oppose PROPOSAL 59: Lengthen the wolf trapping season in Unit 11

Wolves take care of smaller animal populations

Oppose PROPOSAL 60: Lengthen the coyote trapping season in Unit 11

Coyotes take care of smaller animal populations

Oppose Proposal 61-63 Ptarmigan are food for many predators.

Oppose PROPOSAL 61: Change the start date for the ptarmigan hunting season in Unit 13B

Oppose PROPOSAL 62: Extend the spring hunting season for ptarmigan in Units 13A, 13C, and 13D

Oppose PROPOSAL 63: Require a registration permit to hunt ptarmigan in Units 13B and 13E Palmer Area -Units 14A, 14B & 16 (20 proposals)

Oppose PROPOSAL 64: Reauthorize the antlerless moose draw permits in Units 14A and 14B

Support with amendment PROPOSAL 65: Decrease the number of antlerless moose permits for Unit 14A

Only indigenous people should be allowed to hunt them.

Oppose PROPOSAL 66: Open a fall, archery only moose hunt in Units 14A and 14B

Oppose PROPOSAL 67: Open a fall, archery only moose hunt in Unit 16A

Support with amendment PROPOSAL 68: Change the bag limit of the fall, Tier II moose hunt in Unit 16B

Only indigenous people should be allowed to hunt them.

Support with amendment PROPOSAL 69: Shorten the season for the Tier II moose hunt in Unit 16B

Only indigenous people should be allowed to hunt them.

OPPOSE PROPOSAL 70: Extend the hunting season for brown bear in Units 14A and 14B

Bear populations should be protected since they reproduce much more slowly and already suffer from high infanticide rates.

OPPOSE PROPOSAL 71: Extend the brown bear hunting season in Unit 14B

Bear populations should be protected since they reproduce much more slowly and already suffer from high infanticide rates.

OPPOSE PROPOSAL 77: Extend the brown bear season in Unit 14B

Bear populations should be protected since they reproduce much more slowly and already suffer from high infanticide rates.

OPPOSE PROPOSAL 72: Eliminate the harvest ticket requirement for hunting black bear in Unit 16

Black bear populations should be protected, not hunted more.

Oppose PROPOSAL 73: Change the bag limit for sheep in Unit 14A draw hunts to any ram

This affects the ecosystem and the natural predators.

Oppose PROPOSAL 74: Establish a resident, archery only, sheep drawing hunt in Unit 14A

Oppose PROPOSAL 75: Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan

This will affect the ecosystem

Oppose PROPOSAL 76: Allow the take of brown bear in Unit 16, the same day airborne

UNFAIR AND CRUEL, UNETHICAL. Disruptive to wildlife and would wipe out the ecosystem

Oppose PROPOSAL 78: Allow the same day airborne take of wolves in the active, Unit 16 Intensive Management Plan

UNFAIR AND CRUEL, UNETHICAL. Disruptive to wildlife and would wipe out the ecosystem

Oppose PROPOSAL 79: Extend the wolf trapping season in Unit 14A

This will affect the ecosystem

Oppose PROPOSAL 80: Require sealing of beaver taken in Unit 16

Support with amendment PROPOSAL 81: Require traps and snares set within two miles of publicly maintained roads in Unit 14A be checked at least every 36 hours

No traps or snares should be near people or pets, But this is a cruel method of hunting and unethical. I oppose to any hunting with traps or snares.

Support with amendment PROPOSAL 82: Establish 50-yard trapping setbacks along specific trails in Unit 14

No traps or snares should be near people or pets, But this is a cruel method of hunting and unethical. I oppose to any hunting with traps or snares.

Oppose PROPOSAL 83: Extend the spring hunting season for ptarmigan in Unit 16

Oppose PROPOSAL 84: Extend the spring hunting season for ptarmigan in Units 14A and 14B Proposals Outside the Board of Game's Authority The Board of Game may discuss the following proposals but does not have authority to take regulatory action.

PROPOSAL 167: For Unit 17, exempt residents who have a Tribal ID card from having a hunting or trapping license.

PROPOSAL 168: For Unit 17, exempt residents who have a Tribal ID card from having a hunting license for taking small game.

PROPOSAL 171: All domestic animals on lands designated as refuges, critical habitat areas, ranges and parks in the Central & Southwest Region, must be physically restrained by a tether.

PROPOSAL 174: Pause Predator Control program in Unit 17 until ADF&G can come up with a population assessment of bear density.

PROPOSAL 184: Establish a 4-zone management approach in Units 17A, 17B, 17C, 9B,

In conclusion almost all of these proposals harm wildlife and Alaska's environment. Promoting Eco-tourism is good for the state's economy and protects Alaska's wildlife. Hunting for food should only be allowed for residents of Alaska, and trophy hunting should be forbidden.

Thank you for taking the time to read my response to the proposals. Please, protect Alaska's wildlife.

Natascha Howard, Jacksonville, Florida

12/27/24

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: ____Susan Hubbard 12/27/2024

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species like brown bears, caribou, and moose will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly only every 4 to 6 years so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times like when bears are getting ready for hibernation should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19 20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35 36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25 27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33 34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37 38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39 45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46 50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51 56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58 59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60 63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

NAME Susan Hubbard

ADDRESS [redacted] Moreno Valley CA 92553

PC146

Name: Nancy Huie

Community of Residence: Burlington, Vermont

Comment:

I absolutely oppose Prop 75, which seeks the massive aerial slaughter of helpless bears and wolves for no gain as far as increasing caribou, deer etc for hunters to kill. Bears and wolves are being significantly affected by climate change and we need to preserve their numbers. There must be other ways to keep deer and caribou herds robust for hunters.

I support Prop 82 re: 50 yard trapping setback distance so everyone can enjoy and appreciate our lands.

I support Prop 11 to restore the hunting season to pre-2022 length in order to reduce human wildlife conflicts.

Finally, I support Prop 29… direct funding or efforts to preserving the caribou herd through restoration of their environment, not destruction of other species such as wolves and bears. All wildlife is being negatively impacted by climate change and gradual obliteration of our natural resources.

Please help save our bears and wolves. They are an integral part of our ecosystem… culling their numbers for no reason will hurt us eventually.

Thank you.

PC147

Name: Joshua Hunt

Community of Residence: Soldotna

Comment:

I support proposal 3, the main reason I support this is not to gain any advantage over the animals in any way. I typically bait about 2 hours from my house. I try to be a responsible hunter and check my bait at least every other day once it's out and bears are moving. However I've spent tons of money in fuel over the years going back and forth. Although this is my problem, having a camera with cell service would personally help me tremendously with fuel cost and reducing emissions from both my vehicle and side by side. This will also apply to every other hunter making extra trips that could be avoided with the use of cell cams. Thank you.

PC148

Name: Pete Imhof

Community of Residence: Wasilla

Comment:

Proposal 3 allow use of cell cameras

I've been baiting for over 20 plus years and what im seeing is an increase in bear population due to the selective harvest of boars,{ including myself, not many hunters are targeting sows, my opinion}allowing cell cameras will only enhance the selective harvest of boars, we need harvest across the board, ask yourself who's paying for a guided hunt for sows over bait, the last thing we want to see on social media is a cell cam picture of a boar and a dollar valve attached to it...

Proposal 54 back to full curl harvest

I agree and support, but we need to establish a permit area for a any ram tag. the shift of applicates is really obvious, in 2021 when ds180 and 185 were a any ram tag we generated 3446 applicates for the 180 tag and 1772 for the 185 tag. while the ds160 tag had 1944 applicates. In 2024 under full curl draw, DS180 generated 1406 and DS185 had 822 applicates, There were 3260 applicates for the DS160 tag in 24. we shifted a bunch of hunters from full curl DS185 and 180 to the DS160 tag (any ram). all information was collected from the back of the draw supplements.

Proposal 73 approve with amendment

This proposal doesn't have a fixed number of tags, establish allocation for area.

It's not easy for me and many other avid sheep hunters to support anything but a full curl management plan so bare with me, when i looked at 34 yrs of harvest i see a picture of lost harvest opportunity, example in 1992 when we went to a full curl harvest from 7/8, in 91 we harvested 1481 rams state wide, in 92 it dropped to 1108 which makes sense, but what's surprising is we never came back to that high of 1481 prior to the change to full curl, 34 yrs of harvest data shows we lose a good number of rams before they turn legal, avg harvest sense 91 is less than a 1000... and as you know recent statewide harvest is roughly 360 rams statewide in 2024

PC149

Name: Zara Ivanova

Community of Residence: Anchorage

Comment:

As an Alaska resident, I strongly oppose Proposal 75 because it would harm our wildlife and disrupt the natural balance of our ecosystems. I support Proposals 29, 11 and 82 for their role in protecting bears, wolves and the safety of our public lands.

PC150

Name: Bruce Jackson

Community of Residence: Olympia, Washington

Comment:

Proposals: 58, 75, 78, 79

PC151

Name: Keith Jewell

Community of Residence: Palmer

Comment:

I support proposals 3 and 70

PC152

Name: Daniel Jirak

Community of Residence: Wasilla

Comment:

Proposal #75 seems like a mis-allocation of money. Offer bounties for wolves that are licey to increase harvest, which has to be cheaper. Also allowing #76 will increase predator harvest. Intensive management areas should allow non-residents to hunt brown bear without a guide, that would drastically increase harvest and be a source of income for the state.

PC153

Name: Jacob Johnson

Community of Residence: Wasilla

Comment:

I am commenting for my SUPPORT of proposals 3 and 70.

I can see no downside to extending the season in unit 14. It seems that there are more bears and less bear hunters as of recent.

The use of cellular trail cams over bait would benefit a majority of us who have to travel a great distance just to get to the bait stations

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PC154

Name: Rob Jones Jr.

Community of Residence: Chugiak, Alaska

Comment:

I am writing this Comment in Opposition to proposal 51 and 52 in GMU 11. out

This proposal is very allocative in nature without acceptable justification for allocation.

I started my Dall Sheep hunting career in the area that is affected by this proposal. During my several years of guiding there the Dall Sheep population had a very high

ratio of legal rams to the reproductive sheep population. Ram harvest there was always at a reasonable number by both Residents and Non Residents. I no longer work there but regularly talk to guides and residents that still work and hunt there. Even though the Statewide population of Sheep is declining the people that I talk to and still access that area for sheep say that the sheep population and legal ram ratios are still at acceptable levels for sheep hunting opportunities for both non residents and residents alike.

To close a season in a portion GMU 11 to non residents in order reduce competition resident is not acceptable.

Residents have far more opportunity to sheep hunting in Alaska than any non resident would ever have. Alaska residents can access sheep hunting areas anywhere in Alaska where and when a sheep season is open. Non resident hunters are required to be accompanied by a licensed guide under a contract. The registered guide contracting these hunts are restricted to hunting in areas he or she has qualified for and are currently registered into. Once a nonresident contracts with a guide he or she can only hunt in the areas that that guide is currently registered into. Greatly reducing opportunities to nonresidents.

To close a non resident season in order to reduce competition to residents with no apparent need to reduce pressure for conservation and or concern for the species is not acceptable.

Rob Jones Jr.

Chugiak, Alaska

PC155

Name: Cash Joyce

Community of Residence: Wasilla and Chignik

Comment:

SUPPORT OF THE REINSTATEMENT OF 21 DAY SEASON.

Subject – Reinstate Unit 9E, 9D season to 21 Days; Spring/May 10-31 and Fall/Oct. 1-21.

The issues that the now compressed Brown Bear season created has health and safety concerns. If changed it will benefit Locals that live in the area, Commuter Aircraft Operators, On Demand Passenger and Cargo Operators and Commercial and Resident Bear Hunting alike. 10 day hunts are the Norm. The help/employees/pilots that are required for a 15 day season is 2 times more than a 21 day season. Guides/Help/Pilots can be recycled for a second hunt in a 21 day season and that imposes less risk for Air Commerce and all that are involved. Here are the reasons and facts for the aforementioned.

1. Issues that affect Locals in the Chignik Area.

a. Local Residents that live in this region are competing for flights to and from their homes. The barrage of the seasonal workforce in the commercial fishing industry are challenged to get to and from location. Urgent Care response times (Residents travelling for medical appointments) are hindered by the available flights.

b. The Supply chain is competing with the available capacity for freight on available Commuter Aircraft.

c. 3 different Native Corporation Land Holders are long term lessors to this industry, making it necessary to compete with their own economic interests.

d. This issue extends beyond the Chignik Area to every Village on the Alaska Peninsula. The available flights on the Alaska Peninsula have many stops in other Villages and one flight has a large service area to make it economically feasible.

e. Although the Commercial Fishing season is not during the hunting season, many of its operations are at the same time. Deckhands will be arriving in late April and early May to tend to the boats, nets and be on standby for the opener. Likewise, many will be busy with repairs on their boats in October, dry-docking and some part time residents close up their seasonal homes.

2. Issues that affect Commuter Aircraft Operators and On Demand Passenger and Cargo Operators.

a. Operators are already challenged with the increasingly high costs of maintaining Aircraft and Pilots. To purchase more aircraft and hire more pilots for a 15 day window per year is not economically feasible. Stresses to get the workload done in this short window is perpetuating the risk.

b. The challenges that this region has with weather, combined with obligation to fulfill these charter requests in this short amount of time is a safety concern.

c. The amount of infrastructure is not as extensive in this region. There is no Alaska Airlines 737 traffic like the hub in King Salmon. Supplies and Individuals utilize Lake Clark Air, Grant Aviation, Coastal Freight barges from Seattle and the Alaska Marine Highway to survive. The challenges are real.

d. This issue extends beyond the Chignik Area to every Village on the Alaska Peninsula. The available flights on the Alaska Peninsula have many stops in other Villages and one flight has a large service area to make it economically feasible.

3. Issues that affect Commercial Bear Hunting Operators and Resident Hunters alike.

a. The standard for a commercial hunting experience is 10 days, that has been challenged and tested for decades. It is proven that that timeframe is desired. With a 15 day season it forces the operation to have overlapping 10 day hunts. That requires 2 times the guides, pilots and camp help. The amount of supplies and equipment is doubled, and the need to transport it.

b. For a Resident hunter, 10 days or less is pretty much the standard. With less competition for flights they will equally benefit.

c. When the season was 21 days, the same help could work 2 hunts and minimize the amount of transportation commercially and within the operation. Therefore the amount of supplies and equipment were cut in half.

Summary

Currently, you are asking everyone that benefits or even those that do not benefit from this industry to absorb the condensed season. The Health and Safety that this causes, everyone is experiencing. The challenges to meet the demands that are placed Contractually between all the linked parties up this chain could be reduced significantly with the stroke of a pen. Specifically;

1. Land Owners (Native Corporations) whom enter contract with Bear Hunting Operators.
2. Land Managers (Wildlife Refuge Enforcement) whom protect the land and their interests.
3. Scheduled Commuter Air Commerce.
4. On Demand Passenger and Cargo Air Taxis/Charters.
5. Local Residents that Live, Work and Subsist.
6. Seasonal workers in the fishing industry and hunting industry.

Thanks for Your consideration. (Prop 9)

Cash Joyce

PC156

Name: Diane Kastel

Community of Residence: Juneau

Comment:

Proposal 82 - Palmer Trapping Setbacks: SUPPORT

"Proposal 82" is a, special, one for us, as it was, originally, submitted by "AWA", in 2022. We are calling for, trapping, setbacks in Palmer, Game Management "Unit 14". Our proposal asks the BOG" to establish a, 50-yard, trapping, setback along, specific, trails in the area, particularly, ones that are, heavily, used for, recreational, purposes. These, trapping, setbacks would help keep dogs, and, people, safe from, incidental, trapping.

Why we support:

This was a, negotiated, outcome. Originally, submitted, in 2022, the BOG" deferred the proposal until a, stakeholder, meeting between trappers, and, non-trappers could be held to discuss the, setback, proposal. The meeting adjourned with consensus on the, setback, locations, and, conditions listed in the proposal.

Trapping setbacks are popular, easy to put in place, and, seem to work; they have been successful in "Unit 1C", in Juneau, and, in the, Anchorage, municipality.

The, setback, distance is small enough to NOT, significantly, reduce the "BOG"'s ability to manage wildlife.

Trapping setbacks, on these, popular, trails would help reduce, incidental, trap, encounters with recreationists, and, their dogs!

PC157

Name: Diane Kastel

Community of Residence: Juneau

Comment:

Proposal 11 - Shortened, Brown Bear, Seasons Near "Katmai": SUPPORT

"Proposal 11" is for "Unit 9C", located around, "Katmai National Park", in the King Salmon region. The proposal is to shorten the spring, and, fall, brown bear, seasons by, one, week, back to their, previous, length. This would re-establish the season as October 7–21 and May 10–25. The, hunting, season had been, previously, lengthened in 2022!

The author, of the proposal, notes that the area is home to the Moraine, Funnel, and, Kulik Rivers, which are well-known by photographers, film, crews, and, wildlife, viewing, guides. With the current, longer, season, sport, fishermen, and, wildlife, viewers, on these rivers, are being dropped off in the, same, places as hunters! Shortening the, brown bear, season would prevent, further, user, conflicts, and, increase, public, safety!

Why we support:

With the, early, season, hunt, operators were, still, dropping off, sport, fishermen, and, wildlife, viewers on rivers where, bear, hunting was taking place! Hunting camps, and, hunters were occupying, critical, habitats where bears were fishing, forcing, other, users to avoid these areas!

Bears were shot right at the outlet of the Kulik River! . The "Kulik Lodge" had employees breaking down camp, there were, several, groups of, sport, fishermen, on the river, as well as, wildlife, viewers. A bear had cached a, hunter-shot, carcass right at the outlet of the Kulik River where aircraft picked up, sport, fishermen, and, other, visitors!

This proposal would restore the, hunting, season to the, pre-2022, length, and, would reduce, human-wildlife, conflicts!

PC158

Name: Diane Kastel

Community of Residence: Juneau

Comment:

"Proposal 29" - "Mulchatna Caribou Herd" Population, Review: SUPPORT

"Proposal 29" concerns the "Mulchatna Caribou Herd" (MCH") in Unit 17". The "MCH" has been on a, sharp, decline since the late, 1900's, plummeting from 200,000 animals to an, estimated, 30,000 in 2019! In 2020, State biologists determined that the, main, reasons, for the decline, were disease, and, a lack of food, as a result of climate change. To save the, "Mulchatna", herd, the State enacted the "Mulchatna

Predator Control Program", which targets bears, and, wolves, despite NO evidence that, predator, control, programs work, or, that predation was a, main, cause of mortality among the "MCH"!

"Proposal 29" calls for a review of the population, and, harvest, objectives for the "MCH". Minimum numbers are NOT being met, and, the herd has declined, far, below, lower, population, objectives! This review could help abate the State's attempts to increase the caribou, herd through, predator, control, which, in the, two, years that it has run, has killed over 200 bears in the area!

Why we support:

The "Mulchatna", caribou, herd has changed, continuously, from the time monitoring began! The, current, population, objective (30,000-80,000) was established, in 2008, at which point the population was estimated to be 30,000. This objective has been achieved, only, once, since then!

Habitat quality has, likely, changed since the,, last population, objective was established, and, a, new, review MUST take this, into consideration, as it has, almost, certainly, reduced, population, potential!

A review of the population, and, harvest, objective, for the "MCH", would provide, valuable, data to inform, game, management, and, the "Mulchatna Predator Control Program"!

PC159

Name: Carrie Keene

Community of Residence: Chugiak, Alaska

Comment:

I oppose Proposal #75. I strongly object to all aerial hunting, but particularly object to the State of Alaska doing it. I object to the theory of "intensive management plan" and wish the Alaska State Constitution's theory of "sustained yield" to be used instead. Blaming predators for the caribou population decline does not account for other factors such as climate change, drought, heavy snow fall, wild fires, etc. Predators are a natural part of the ecosystem. I think the Board of Game should consider the benefits of the predators such as viewing by residents and tourists.

I agree with Proposal #82. Trapping should be done away from trails which the public often uses. Dogs and small children should not be endangered by traps set so close to trails.

PC160

Name: Judy Kimminau

Community of Residence: Colorado

Comment:

Thank you for considering my comments.

Proposal 75 - OPPOSE - this is inhumane, cruel and unnecessary. Its outdated policy that has not to be effective and aerial predator control is just wrong.

Proposal 82 - SUPPORT - this is a smart proposal created in collaboration with those who will be impacted by it.

Proposal 11 - SUPPORT - this decreasing the hunting season by one week (back to where it was previously) and will reduce conflict between hunters, guides, photographers, film crews and sport fishermen/women.

Proposal 29 - SUPPORT - Killing more bears to help the caribou without updated information is not good science and its cruel and deadly to the bear population. If you want to help the caribou, do another review.

PC161

Name: Rebecca King

Community of Residence: Anchorage

Comment:

Dear Board of Game Members,

I am writing in opposition to proposal 33 for the same day aerial take of wolves by the Department of Fish and Game as describe in the Anchorage Daily News article (https://www.adn.com/alaska-news/wildlife/2024/12/22/state-proposes-killing-100-wolves-a-year-to-benefit-moose-between-denali-and-lake-clark-parks/).

My understanding is that wolf populations rebound quickly and that there is evidence that this type of predator control is ineffective for increasing moose for hunting harvest by humans.

In addition, it seems terribly cruel. Wolves have a strong social structure and are relatively intelligent animals. To terrorize them with airplanes and then pull apart their pack structure is not right. Honestly, trapping must be as bad. But, especially if this is state sponsored, any removal of predators should be as humane as possible.

The tourism industry has long been one of the top sources of income for our economy. It is impossible to guarantee that the wolves of Denali National Park won't become part of these aerial wolf hunts, and disrupt a highlight of the wildlife tourism experience.

I recognize that I am not someone who harvests moose for food. However, my tax dollars would help pay for this program and I appreciate you considering my viewpoint.

Sincerely,

Rebecca King

PC162

Name: Holly Kirkland

Community of Residence: Delaware

Comment:

1,2,3,9,12,13,14,15,16,17,19,21,23,25,26,27,32,33,34,37,38,43,44,57,58,59,60,64,66,67,70,72,75,76,77,78,79 STONGLY OPPOSE!

This comment is relevant to all of these proposals. These animals are known to pass down survival information to successive generations. Please read the book "Beyond Words" by Carl Safina, particularly regarding the wolves. In eliminating and reducing restrictions, you are endlessly endangering the welfare of the entire species population by destroying the animal societies and fraying their knowledge base and family roots. You should be ashamed. These proposals are entirely anthropocentric, and there is not enough data provided to ensure the increase in takes of these species won't disrupt the entire ecosystem. Nature can balance itself!

PC163

Name: Joey Klutsch

Community of Residence: King Salmon

Comment:

My name is Joey Klutsch. I am a member of the Naknek/Kvichak AC, a life long resident of King Salmon, and full time big game hunting guide. I am writing to express my support for proposal 9, which is backed by the Department of Fish and Game. Proposal 9 is very similar to proposals 12, 13, 14, 15,16, and 17, and for the most part they are all aimed at re-establishing the resident/nonresident bear seasons in GMU 9D and GMU9E back to the original dates of October 1-21 and May 10-31. These were the season dates for both residents and non residents prior to 2018, when the fall and spring seasons were shortened by a week, to run Oct. 7-21 and May 10- 25. These new proposals would simply move the seasons back to what they were. I am strongly in support of this. For simplicity, I will support proposal 9, which is the one the Department of Fish and Game is in support of.

My reasons for support of proposal 9 are as follows:

The season was shortened by the BOG, which I believe went into effect in the spring of 2018, to help reduce harvest of sows and bring up a supposed missing age class of bears, from an apparent decrease in

the population, that happened around 2012, possibly due to winter die offs of bears during what were a couple of particularly hard winters in the region. Currently, the brown bear population is doing very well. Based off of my extensive time in field guiding each year in GMU9E I can say that there are plenty of bears of all age classes and many sows with strong cub survival rates. I see bears of all age classes, from sows with cubs, to juveniles, mid aged bears and bears of old age class. Fish runs have been very good and there is plenty of food for them. Young bears are surviving just fine and making it to adulthood. Whatever die off there was, if any, was around 10 years ago, and there are now bears of all age classes, in abundant numbers

More importantly, having spoken with the ADF&G biologist, harvest numbers show that we are in line with the brown bear management plan guidelines, and boar to sow harvest ratios are normal, as are total number of bears harvested. There is no cause for concern about the population of the bears in GMU9, nor is there concern about too many bears of a certain age class (or sows) being harvested. Numbers from ADF&G show in 2023, just over 200 bears were harvested, 76% boars and 24% sows. This is very similar to 2015 and 2017, prior to the season change.

From the standpoint of a guide, starting the brown bear season October 7 makes operations extremely difficult, and in many cases more dangerous, especially when it comes to flying. There is less daylight and the weather is markedly worse, with greater chance for icing conditions when flying. As someone who has guided in GMU9E for over 20 years, I would like to be wrapping up my bear season around October 10-12, not having just started it. The October 7 season start date has made everything about guiding fall bears more difficult. This is true for resident hunters as well. Many of the local air taxis that operate out of King Salmon, which is the hub for most of unit 9, do not even want to operate past mid October, and I know more than one that dont. This greatly limits access for both guides and residents. I personally have had air taxis tell me that if my clients were not done by a certain date they were going to leave and I would have to find another way out of the field. This is because pilots do not want to fly late in the season, and I don't blame them. I don't want to have to hunt late because the season starts so late.

With the current season start date of Oct 7, bears in many cases have moved off the salmon streams, making hunting them more difficult. Most of the bears that are still on the streams at that time of year are young bears and sows, with the large boars having finished up on fish. This, coupled with less time to hunt, and more days of hunting missed due to poor late season weather conditions, leads to a higher probability that these younger boars or sows will be harvested by hunters (resident or guided) who are eager to get a bear before the end of the season. These are the bears that we do not want to see harvested. This applies to guided hunters and resident hunters.

As a guide, I can personally say that I will not be taking more hunters if the season goes back to the longer dates, but I will be able to offer a longer, safer hunt, where we do not feel as rushed to get the job done, and it is easier to be more selective. I know most guides feel the same way. The same can be said for spring. I would argue strongly that having more time to hunt allows us to be more selective, targeting the mature boars that should be harvested, and avoiding sow and young boar harvest.

Next, I would like to oppose proposals 11 and 18. These are very similar and are written with the intent of shortening the bear season in GMU9C by a week. Current seasons are Oct 1-21 and May 10-31. The proposed seasons would be Oct 7-21 and May 10-25. Recently, the department rightfully acknowledged there was absolutely no biological concern with the brown bear population in GMU9C, and the BOG moved the seasons back to Oct 1-21 and May 10-31. This went into effect for the fall of 2023. After just having changed the season back to its original dates, there is no reason to re-shorten them

There is a tremendously healthy population of brown bears in GMU9C, massive portions of which are encompassed by Katmai National Park and totally off limits to hunting. This is premier bear habitat and has many bears. There is very little hunting pressure in the areas where hunting is allowed. I personally live in GMU9C and can attest to the number of bears here. Further, salmon runs have been at an all-time high in recent years and there is an extremely abundant food source to help ensure healthy bear populations.

What we are seeing with these proposals is very simply CUA holders that operate in the Katmai region, taking bear viewers and fishermen, that do not like hunting. They have no interest in sharing the resource with other users. They wrongfully see hunting as a threat to their segment of the tourism market. They wrongfully see a conflict with bear hunting in the fall, some of which happens in Katmai Preserve, near where late season sport fishing happens. I will add that there never used to be a late season sport fishing in mid October. This is a newer thing. Brown bear hunting has been going on for a very long time, however. Further, the fall brown bear hunts only happen every other year. The perception of a conflict between hunters and bear viewers/fishermen is simply false. Most of the bear viewing and fishing takes place in Katmai Park. The hunting takes place on Katmai Preserve only. These proposals are aimed at one camp in particular that gets hunted in Katmai Preserve on Nonvianik Lake, about a mile and a half from the mouth of the Kulik River. The fishing and bear viewing takes place on the river, which is Park The hunting takes place on the lake, which is Preserve. There is no conflict. The only conflict there is the gross overuse of the resource by lodges bringing in fishermen. Bear hunting does not pose a threat to the bear population, nor does it pose a risk to other users from so called "wounded bears" as the writers of these proposals would have you believe. This is simply false. I can tell you that nearly all of the bears that are harvested in that particular area have shotgun bird shot in them, which is not from hunters. It is from fishermen and the nearby lodge.

There is plenty of room for both user groups (hunters, fishermen, and bear viewers), and no biological concern in what is one of the healthiest bear populations in the world.

PC164

Name: Michael Knapp

Community of Residence: Wasilla

Comment:

PROPOSAL 80 I SUPPORT THIS PROPOASL ,,,having trapped in GMUs 13 14 and 16 for the last 30 years,In the last ten years I have seen a marked decline in the beaver population in all 3 GMUs. The only thing there is more of in these GMUs is people.

PROPOSAL 81 I STRONGLY OPPOSE THIS PROPOSAL no,1 Most modern conibear traps meet or exceed international standards . The standard I believe if i remember correctly for marten traps (120 coni bears) is to kill or render unconscious in 3 min or less Also there is now exception for traps set under the ice or water or above the ground ...regarding snares ,,,modern snares with kill springs are designed to kill in a short period of time . It doesn't matter how far from the rd you set any trap like I have mention above they all dispatch the animal in the same amount of time ,,,, way under a hour

I STRONGLY OPPOSE PROPOSAL 3 .Basically it would allow someone to put out a bait and sit in there living room and view the bait. If there doing that and not hunting the bait I would think that would count as feeding wildlife. That isn't even close to hunting and isnt fair chase

I STRONGLY OPPOSE PROPOSAL 2. Having hunted extensively in units 14A and 14B for the last 30 plus years.. I can tell you there isn't the amount of black bears in these units as there was 30 yrs ago... Places I used to be able to easily find black bears years ago I don't find them at all.Having a fall baiting season like is now in place in unit 16 would only make less black bears in unit 14 a and 14 b than there is now .

Dec. 27, 2024

Hello Alaska Board of Game Members,

Please accept my comments on the below four proposals to be considered during your January 2025 Board of Game meeting for the Central and Southwest Region.

I am a nearly 50 year resident of Alaska and hold a degree in wildlife management. My husband and sons hunt mainly for deer and sometimes moose, as well as smaller game like grouse. Venison, harvested from Sitka Blacktail deer comprise 98% of the red meat in my family's diet. We live in a federally recognized subsistence use community, and fully understand the value of that designation, including our rights and responsibilities which accompany such a designation. With that in mind….

I Support Proposal 11: Shortened Brown Bear Seasons Near Katmai

This proposal would re-establish the spring and fall Brown Bear season back to October 7–21 and May 10–25 consistent with its former length. This reasonable action would only reduce the current Spring and Fall Unit 9C season by one week and would curtail current hunter/wildlife viewer conflicts in the area. As you likely know the area is a wildlife magnet for both user groups and as currently managed poses serious safety risks as well as user conflicts. Proposal 11 is the responsible course of action

I Support Proposal 29: Mulchatna Caribou Herd (MCH) Population Review

This proposal supports a review of current population and harvest objectives for the MCH. Despite those well-intentioned objectives, the MCH in Unit 17 has plunged drastically since the late 1900's from 200,000 animals to a shocking 30,000 in 2019 and likely a much further drop since then. According to SOA Biologists the culprit of the decline was due to depleted food resources and disease attributed to climate change. It is clear that the Mulchatna Predator Control Program, enacted to remedy the plummet, was ineffective by ignoring the real cause of the decline. A review of the population objectives harms no one and in fact, could be a great aid to determine a better course of action which truly addresses the problem rather that continuing a broken policy. I urge you to adopt Proposal 29.

I Oppose Proposal 75: Aerial Gunning Outside of Denali

To increase moose populations, Proposal 75 would authorize ADFG staff to kill via "intensive management" black bears, brown bears, and wolves with the use of aircraft, including helicopters, in all of Game Unit 16 to "achieve [predator] reduction goals". As you are likely aware, this proposal has the potential to be another highly unpopular déjà vu all over again— that is, *another* Mulchatna Predator Control program.

But beyond it's valid low popularity ratings, for the last 20 plus years the State's Intensive Management program to increase moose populations has been a dismal failure. With each "tinkering" iteration of the previous plan, the desired results have been unsuccessful to the point where one must question if the end result will be a complete breakdown of a healthy predator prey relationship and catastrophic declines of all involved species.

From a scientific perspective, as well as a practical and budget conscious point of view, this proposal to increase human moose harvest makes no sense. According to highly qualified scientists regarding the SOA's wildlife management in Alaska:[1]

*"We also observed **no differences** in mean moose harvests during periods of officially designated wolf control (2005–2020) and a previous period (p > 0.50). We recommend that predator reductions designed to improve hunter harvests of moose be conducted within a research framework that will permit improved interpretations of results and the implementation of an adaptive-management approach to achieve management objectives* [empahsis added]*."*

I also urge you to consider other conclusive findings that urge you to use science based management in your decision making:[2]

*"**Science-based** management of large carnivores in most of Alaska will require the political will and wisdom to repeal Alaska's Intensive Management law. Alternatively or additionally, it will require professional wildlife managers to resist adoption of predator reduction regulations that are not conducted as experiments and/or do not include adequate monitoring programs of both carnivores and ungulates; this was a key*

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[1] Efficacy of Killing Large Carnivores to Enhance Moose Harvests: New Insights from a Long-Term View. Miller, Person, Bowyer *Diversity* 2022, *14*(11), 939; https://doi.org/10.3390/d14110939

[2] Large carnivores under assault in Alaska. Ripple, Miller, Schoen, Rabinowitch

recommendation in the 1997 report of National Research Council. The state of Alaska also should be candid with the public about the absence of science supporting the efficacy of predator control programs to achieve established objectives with regard to ungulate harvests instead of making unsupported claims of "success" for wolf reduction efforts in publicly distributed booklets about Intensive Management (e.g., [15]) [emphasis added]"

Please do not ignore the insights and conclusions contained in these scholarly pieces in your decision-making.

Finally, if the above points make no difference in your decision-making, State of Alaska budgetary shortfalls should.[3] Accordingly,

"The Intensive Management program against bears and wolves a few hundred miles west cost $231,000 in 2022 and $612,000 in 2023 (page 14, 2024 annual report to Board of Game) Predator control as a whole has accounted for ***~$2.5 million in lost federal funding*** [emphasis added]*, as Pitman Roberts funds cannot be used for Intensive management.*

I urge you to strongly Oppose Proposal 75.

I Support Proposal 82: Palmer Trapping Setbacks

This proposal would reduce conflicts between humans and their dogs and incidental trapping by establishing a 50-yard trapping setback along specific trails in Unit 14 near Palmer, particularly ones that are heavily used for recreational purposes. As part of your decision-making please considered your own domestic dogs or those of your good friends and neighbors. I hope that pushes you in favor of supporting this common sense proposal.

Sincerely,

Rebecca Knight

Petersburg, AK

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[3] Annual Report to the Alaska Board Of Game on Intensive Management for Mulchatna Caribou with Wolf and Bear Predation Control in Game Management Units 9B, 17, 18, and 19A&B. Prepared by the SOA Division of Wildlife Conservation. February 2024.

PC166

Name: Masha Koroleva

Community of Residence: Anchorage

Comment:

This is for proposals 58, 59, 78, and 79. We should NOT extend wolf hunting or give more opportunities for more wolves to be killed. Wolves are uniquely important for other wildlife populations in that they attack mostly weaker or older prey animals, leaving only healthy and young prey animals in the ecosystem. If you hunt moose, elk, bison, hares, etc: wolves are your friend! Some may think that less predators means more prey but this is not the case with wolves. Less low quality prey/game means more healthy/high quality prey/game that can reproduce faster and more frequently. With wolf populations maintained, the whole ecosystem benefits.

PC167

Name: Cole Kramer

Community of Residence: Kodiak Alaska

Comment:

SUPPORT of Proposal 9

Subject- Reinstate unit 9E, 9D season to 21 days: Spring / May 10-31 & Fall/ October 1- 21.

The issues that the now compressed brown bear season created has health and safety concerns. If changed, it will benefit locals that live in the area, commuter aircraft operators, on demand, passenger and cargo operators and commercial and resident brown bear hunting alike.

**Important to Understand that the lengthening of the season from 15 day to a 21 day season, is not intended to increase harvest numbers. Especially pertaining to guided hunters on Federal, Parks, or Private/ Native lands. These harvest numbers / amount of permits are set by the land holders. This will reduce impact on the land & hopefully increase trophy quality of overall harvest.

10 day hunts are the normal. The help/employees/ pilots that are required for a 15 day Season is two times more than a 21 day season. Guide/ Help/ Pilots can be recycled for a second hunt in a 21 day season that imposes less risk for air commerce in all that are involved. Here are the reasons and facts for the aforementioned mentioned.

1. Issues that affect locals in the 9E & 9D villages.

A. Local residents that live in the regions are competing for flights to and from their homes. The barrage of seasonal workforce in the commercial fishing industry are challenged to get to and from location.

B. Urgent care response times are hindered by the available flights. (residence traveling for medical appointment)

C. The supply chain for villages, is competing with the available capacity for freight on available commuter aircraft.

2. Issues that affect commuter, aircraft, operators, and on-demand passenger and cargo operators.

A. Operators are already challenged with the increasingly high cost of maintaining aircraft and pilots. To purchase more aircraft and hire more pilots for a 15 day window per year is not economically feasible. Stresses to get the workload done in the short window is perpetuating the risk.

B. The challenges that this region has with Weather, combined with obligation to fulfill these charter request in this short amount of time is a safety concern.

C. The amount of infrastructure is not as extensive in this region. There is no Alaska Airlines 737 traffic like the hub of King Salmon. Supplies and individuals utilize Lake Clark Air, Grant Aviation, coastal freight barges from Seattle and the Alaskan Marine Highway to survive. The challenges are never ending.

D. This issue extends throughout the whole entire Alaska Peninsula area. The available flights on the Alaska Peninsula have many stops and other villages and one flight has a large surface area to make it economically feasible.

3. Issues that affect Commercial Bear Hunting Operators, and Resident Hunters alike.

A. The standard for a commercial hunting experience for brown bear is 10 days. When a 15 day season is in place, it can force an overlap on the hunts, of which can have an undesirable experience for the hunter and guide alike. Weather delays can cause flights to back up, to and from the hunt area. Thus creating stress on pilots, outfitters, guides, hunters/ customers, Alaska Troopers checking camps & locals in the villages providing accommodations. Stress can cause poor judgment to safety concerns to either one or all of these facets.

B. A Fifteen day season requires more guides, hunters, camps and aircraft in the field during this time period by two times the amount, leaving less camps available for locals or other residents flying down to hunt.

C. Guides / Employees in the spring season often times would like employment on Kodiak Island . Outfitters want them to commit until May 15th. Many guides would like to extend their season to hunt on the Peninsula but as the current season sits, it makes it very difficult for them to make it in time to conduct a hunt for an outfitter on the peninsula due to a hunt on Kodiak going the full length of season till May 15th. Then travel time to and from peninsula. Often times this forces the guide / employee to choose Kodiak Island or the Alaska Peninsula, thus lowering the amount of employable, high quality guides available in the industry to service both hunt areas.

Benefits to a 21 day season

1. Allowing more time for safety concerns

of the Charter companies, Pilots, Troopers, Guides, Hunters/ Customers & Locals.

2. Better quality guides available to guide hunters.

3. Allow for more on the job training for apprentice assistant guides or packers accompanying a registered or assistant guide that is qualified to make the right calls in the field to conduct a quality, safe hunt with

the desired outcome of the client, outfitter, & area biologist. Thus reducing the amount of female bear harvest.

4. With the season going until May 31st you may will see more boar / sow activity where they are around each other. Creating an opportunity for guides or resident hunters to correctly identify sex of bear. Once again reducing the amount of female harvest.

5. Allowing for more space / camps available for resident hunters that may be flying to the areas.

6. Having less camps in the field all at once, I believe will be less stress on the Alaska State Troopers that are unfortunately under staffed. I believe this will create a better experience for the Trooper, Hunters and Guides.

7. Longer season provides a more stable economic impact on the villages and those providing lodging for guides & hunters (resident & nonresident)

8. Having less camps in the field and airplane activity versus all at once during a 15 day season, I believe will provide more unmolested space for the wildlife and a better experience for all users of the landscape humans and animals alike.

Thank you for your time & consideration.

Sincerely,

Cole Kramer

Registered Guide

Kramers Kodiak Guide Service

PC168

Name: James LaBerge

Community of Residence: America

Comment:

OPPOSE.

#53, 59, 75, 79.

Science suggests these predator control measures will be unsuccessful, and that they will damage ecosystems. Please do not approve these measures!

Thank you.

PC169

Name: Cindy Lang

Community of Residence: Thomaston Me

Comment:

No no no to your proposal 25!!! For goodness sakes, stop destroying murdering, killing our wildlife. Wildlife really have a much more crucial important role in our ecosystems than humans do!! Humans cannot continue to live on this planet, as they are destroying exactly what makes life as we know it possible. Thank you!

PC170

Name: Alexandra Larson

Community of Residence: Minneapolis

Comment:

Proposals 32, 33, 34: I oppose the murder of black bears and wolves. We are encroaching on their land and they do not deserve to die as a result. I propose sedation and rehoming of the animals rather than execution.

PC171

Name: Michael Larson

Community of Residence: Eagle River

Comment:

Proposal 50 :

I support with the amendment submitted by Kolton Eischens.

Proposal 55:

I support with an amendment to split DG720 into separate permits consisting of smaller hunt areas with separate and specific quotas. I would also propose the Tonsina Controlled Use Area be removed from the DG720 permit and designated as a Registration Goat hunt.

PC172

Name: Anne Lebo

Community of Residence: Camp Hill

Comment:

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Anne Lebo

DATE: 12/27/2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature’s balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife, and tourism can thrive.

Thank you for listening.

Anne Lebo

[redacted]

Camp Hill, Pa 17011

PC173

Name: Nancy Lee

Community of Residence: Los Angeles, California, USA

Comment:

I oppose ALL of the proposals except 65, 68-69, which I support with amendment. It is my strong belief that any laws that allow hunting will disrupt the natural balance of the area's ecosystem and cause harm that would take years to undo. Alaska's wildlife is far better for both the ecosystem and the impacted area's economy if left undisturbed. If these proposals are enacted, tourism would dwindle and local jobs would be lost.

I support 65, 68 and 69 with amendments that include lowering the bag limit, and prioritizing permits going to the local indigenous people who kill only what they need for their own survival. Trophy hunting is a sick and disgraceful waste of a limited natural resource and a depraved source of entertainment. Hunters should shoot with their cameras instead of their guns.

Submitted by: Roseann Leiner
Community of Residence: Hawaii;
I was a resident of Palmer,Alaska from 1982-2009 and 2013-2017

I am writing in response to the recent proposals brought before The Board of Game. Below, I have addressed some proposals that affect bears, in numerical order, to explain my position on them.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions:

Permitting hunters to harvest bears without incurring a fee diminishes the financial resources needed to fund wildlife protection and maintain a healthy population. Fees serve as a crucial revenue source for the state, contributing to the funding of ADFG programs. Fees enhance accountability among hunters and supply valuable data for researchers. Bears have a slow reproductive rate, typically giving birth every 4 to 6 years, with approximately one-third of cubs not surviving their first year. Consequently, over hunting poses a significant risk to the population's stability. Fees serve as an additional framework to assist in preventing over harvesting.

Further, the economy in game unit 9 is significantly influenced by the tourism generated from bear viewing activities. Preserving bear populations is advantageous for Alaska's economy, as tourists are drawn to observe them living in their natural habitat rather than in a deceased state. A study released by the University of Alaska Fairbanks titled "The Economic Contributions of Bear Viewing in South Central Alaska" revealed that wildlife viewing at Katmai National Park and Preserve and Lake Clark National Park and Preserve generates a combined annual contribution of 135.5 million dollars to the Alaskan economy. (Source: https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

Alaska must exercise caution to avoid over harvesting the bears in this region if we wish to maintain the ecological balance of this region, which will benefit both the hunters, bear watchers, and the wildlife. Not requiring hunting fees reduces the ADFG's ability to manage the state's resources and fees provide an additional set of guardrails to help to prevent over harvesting. Eliminating fees may cause a detrimental impact on the department's ability to operate, with the ongoing state funding issues. Furthermore, the proposal is short-sighted because it does not take into consideration loss of the tourism revenues.

OPPOSE Proposal 2: Open two bear baiting seasons :

Baiting bears with food teaches bears to associate humans as a source of an easy meal which makes bears more likely to engage in dangerous conflicts with people. Keeping the bear baiting season to one time block in the spring will lessen the chances of a deadly encounter occurring to other recreationists who may unknowingly stumble into a bear baiting area. The proposed time block for a second bear baiting season falls during the time period that other recreational user groups are most likely to be in the backcountry. Since 19 out of 26 game units in Alaska have no closed season for black bears, bear hunters will still have access to other areas to hunt bears.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and contradicts the fair chase/sporting ideology that underpins hunting. Giving hunters the ability to monitor an area with cameras in real time, just as they can monitor their home from anywhere using security cameras, will eliminate any vestige of the fair chase/sporting principle. The use of bait stations already gives hunters an advantage when hunting bears. Allowing live cameras has the potential to decimate the population. If we want to maintain an ecological balance and preserve our wildlife for future generations, then this board should not allow the use of cellular cameras for bear hunting.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening the hunting season will create the potential for dangerous conflicts with other user groups who also flock to the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Lengthening bear hunting seasons puts too much pressure on bears and other animals in an area with a short time frame for them to take advantage of the summer's nutritional resources.. Bears reproduce slowly—only every 4 to 6 years and 1/3 of cubs do not survive their first year of life, so over hunting could rapidly decrease the population. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The revenue that is created by fishing and wildlife tourism surpasses the economic benefits derived from extending the bear hunting season. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. According to the Alaska Travel Industry's *Alaska's 2022-2033 Visitor Profile* report, 66% of the total visitors stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Among the visitors who hire guides, 30% were sightseeing guides, 29% were wildlife viewing guides, 17% were fishing guides, and only 6% of guides that were hired were hunting guides. Clearly, Alaska cannot afford to alienate its wildlife viewing visitors in order to accommodate just 6% of its total visitor base. (Source: https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf)

SUPPORT Proposal 10: Close Unit 9A to nonresident brown bear hunting

I support this proposal for all of the reasons that the author has stated. Bears have a slow reproductive rate, typically giving birth every 4 to 6 years, and approximately one-third of cubs do not survive their first year, so over hunting would take years for them to recover from. ADF&G has not conducted a Unit 9A brown bear population or density surveys in recent decades so the health of the population is unknown. The economy in game unit 9 relies significantly on the income generated by bear viewing. Preserving bear populations is advantageous for Alaska's economy, as tourists come to see them alive, not dead. A study published by the University of Alaska Fairbanks - *The Economic Contributions of Bear Viewing in South Central Alaska* found that wildlife viewing for Katmai National Park and Preserve and Lake Clark National Park and Preserve contributed a yearly combined total of 135.5 million dollars to the

Alaskan economy. (Source: https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

SUPPORT Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

I support this proposal for all of the reasons that the proposal has stated. A longer hunting season creates more dangerous conflicts with other user groups who also flock to the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters occupying essential habitats where bears fish will negatively impact the survival of all species reliant on salmon, as well as harm the ecosystem that relies on the nutrients provided by fish remains and animal waste.

Hunting animals that have become accustomed to human presence raises significant ethical concerns. The economy in game unit 9 relies significantly on the tourism generated by bear viewing. The prolonged hunting period restricts the safe usage of the area for other user groups and primarily benefits one group to the detriment of all others. Preserving bear populations is advantageous for Alaska's economy, as tourists are drawn to witness these animals living in their natural habitat rather than in a deceased state. Killing well-known bears in front of wildlife viewers will tarnish the state's reputation among current and prospective wildlife enthusiasts globally, leading to a decline in visitation. The economic consequences will result in a more significant negative impact on the state than can be offset by the financial contributions of trophy hunters during an extended bear hunting season. The Alaska Travel Industry's *2022-2023 Visitor Profile* report indicates that 66% of total visitors identified wildlife viewing as one of their primary activities. Additionally, 30% specified bear viewing as a primary activity, while only 6% noted hunting as a primary activity. Among the visitors who employed guides, 30% opted for sightseeing guides, 29% chose wildlife viewing guides, 17% selected fishing guides, and a mere 6% hired hunting guides. (Source: https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf)

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

An extended hunting season may lead to potential conflicts with other user groups that also engage in activities within the area. It is unreasonable to assume that an extended hunting window will not attract a greater number of hunters to the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Prior to extending the hunting season, it is essential for biologists to conduct a study to assess whether the bear population has genuinely recovered. At present, there are no baseline studies available regarding the population of bears in this region of the state. This proposal relies

on anecdotal observations from individuals who stand to gain financially from its approval, rather than on robust scientific data. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. To have well known bears killed in front of wildlife viewers will give the state a black eye in the minds of both present and future wildlife viewers worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact on the state than the longer bear hunting season can be compensated for by trophy hunter's dollars. A study published by the University of Alaska Fairbanks - *The Economic Contributions of Bear Viewing in South Central Alaska* found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. This proposal poses a threat to both the bear population and the local economy. (Source: https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons and bag limits in Units 9D and 9E for residents and nonresidents

An extended hunting season may lead to potential conflicts with other user groups that also engage in activities within the area. It is unreasonable to assume that an extended hunting window will not attract a greater number of hunters to the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Prior to extending the hunting season, it is essential for biologists to conduct a study to assess whether the bear population has genuinely recovered. At present, there are no baseline studies available regarding the population of bears in this region of the state. This proposal relies on anecdotal observations from individuals who stand to gain financially from its approval, rather than on robust scientific data.

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OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

An extended hunting season and bag limit may lead to potential conflicts with other user groups that also engage in activities within the area. It is unreasonable to assume that an extended hunting window will not attract a greater number of hunters to the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Prior to extending the hunting season, it is essential for biologists to conduct a study to assess whether the bear population has genuinely recovered. At present, there are no baseline studies available regarding the population of bears in this region of the state. This proposal relies on anecdotal observations from individuals who stand to gain financially from its approval, rather than on robust scientific data.

Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. To have well known bears killed in front of wildlife viewer will give the state a black eye in the minds of both present and future wildlife viewers worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact on the state than the longer bear hunting season can be compensated for by hunter's dollars. A study published by the University of Alaska Fairbanks - *The Economic Contributions of Bear Viewing in South Central Alaska* found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. This proposal poses a threat to both the bear population and the local economy. (Source: https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

An extended hunting season may lead to potential conflicts with other user groups that also engage in activities within the area. It is unreasonable to assume that an extended hunting window will not attract a greater number of hunters to the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Prior to extending the hunting season, it is essential for biologists to conduct a study to assess whether the bear population has genuinely recovered. At present, there are no baseline studies available regarding the population of bears in this region of the state. This proposal relies on anecdotal observations from individuals who stand to gain financially from its approval, rather than on robust scientific data.

Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. To have well known bears killed in front of wildlife viewers will give the state a black eye in the minds of both

present and future wildlife viewers worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact on the state than the longer bear hunting season can be compensated for by trophy hunter's dollars. A study published by the University of Alaska Fairbanks - *The Economic Contributions of Bear Viewing in South Central Alaska* found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. This proposal poses a threat to both the bear population and the local economy. (Source: https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

A longer hunting season creates more dangerous conflicts with other user groups who also utilize the area. It is illogical to believe that a longer hunting window will not bring more hunters into the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Before the hunting season is lengthened, a study needs to take place by biologists who have no financial stake in the matter to determine if the bear population has in fact recovered. Currently, there is an absence of baseline studies on how many bears are in this part of the state. This proposal is based on anecdotal observations of individuals who will reap significant financial gain in its passage rather than sound scientific data. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others.

Protecting bears is better for Alaska’s economy because tourists come to see them alive, not dead. To have well known bears killed in front of wildlife viewers will give the state a black eye in the minds of both present and future viewers worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact in the state than the longer bear hunting season can be compensated for by hunter's dollars. According to the Alaska Travel Industry's *Alaska's 2022-2033 Visitor Profile* report, 66% of the total visitors stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who hired guides, 30 % were sightseeing guides, 29 % were wildlife viewing guides, 17 % were fishing guides, and only 6% of guides that were hired were hunting guides. To be clear, Alaska cannot afford to alienate its wildlife viewing visitors in order to satisfy 6% of its total visitors. (Source: https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf)

Extending the hunting season may overburden bear populations, which can’t recover quickly due to their slow reproduction rate. According to the Katmai National Park researchers, 1/3 of brown bear cubs do not live to their first birthday. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

A longer hunting season creates more dangerous conflicts with other user groups who also utilize the area. It is illogical to believe that a longer hunting window will not bring more hunters into the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Before the hunting season is lengthened, a study needs to take place by biologists who have no financial stake in the matter to determine if the bear population has in fact recovered. Currently, there is an absence of baseline studies on how many bears are in this part of the state. This proposal is based on anecdotal observations of individuals who will reap significant financial gain in its passage rather than sound scientific data.

Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. To have well known bears killed in front of wildlife viewers will give the state a black eye in the minds of both present and future viewers worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact in the state than the longer bear hunting season can be compensated for by hunter's dollars. According to the Alaska Travel Industry's *Alaska's 2022-2033 Visitor Profile* report (1), 66% of the total visitors stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who hired guides, 30 % were sightseeing guides, 29 % were wildlife viewing guides, 17 % were fishing guides, and only 6% of guides that were hired were hunting guides. (Source: https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf)

Another study that was published by the University of Alaska Fairbanks - *The Economic Contributions of Bear Viewing in South Central Alaska* (2) found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. This proposal poses a threat to both the bear population and the local economy. Clearly, Alaska cannot afford to alienate its wildlife viewing visitors in order to satisfy 6% of its total visitors. Extending the hunting season may overburden bear populations, which can't recover quickly due to their slow reproduction rate. According to the Katmai National Park researchers, 1/3 of brown bear cubs do not live to their first birthday. This proposal risks wiping out bears in these areas. (Source: https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

SUPPORT Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

I support this proposal for all of the reasons in this proposal. The bear population within Katmai National Park is closely observed by naturalists, rangers, park visitors and live camera viewers. It is widely recognized among this group that a considerable number of the regular bear population did not return to Brooks Falls this year. Bear viewing brings a tremendous amount of attention and revenue to the state. In this year's “Fat Bear Week” contest, over 1,041,124 votes were cast with between 80,000 – 100,000 people voting on a daily basis. Bear enthusiasts worldwide have recently become aware of the various proposals regarding the bears of Unit 9 and are actively seeking to educate themselves on these issues. The tourism industry in Alaska suffered greatly during the Covid pandemic with many businesses being forced to permanently close.. While tourism is on the rebound, the state cannot afford to lose the economic advantages of the wildlife viewing public. According to the Alaska Travel Industry's *Alaska's 2022-2033 Visitor Profile* report (1) 66% of the total visitors to Alaska stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who hired guides, 30% were sightseeing guides, 29% were wildlife viewing guides, 17% were fishing guides, and only 6% of guides that were hired were hunting guides. (Source: https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf)

In a different study published by the University of Alaska Fairbanks - *The Economic Contributions of Bear Viewing in South Central Alaska* (2) found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. The 2011 *National Survey of Fishing, Hunting, and Wildlife-Associated Recreation* (2) reported that there were 640,000 total non-consumptive wildlife-viewing participants in the State of Alaska including both residents and non-residents. These wildlife-viewers spent a total of more than $2 Billion in 2011, with the average participant spending about $3,200. Clearly, Alaska cannot afford to alienate it's wildlife viewing visitors in order to appease 6% of its total visitor base. (Source: https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This proposal would only encourage over harvesting of bears in the area. Defense of Life and Property is still an option in the off season, and the reporting process provides a guard rail to prevent over harvesting. ADFG recommends that hunting should be avoided while a predator control program is in place, which it is.

OPPOSE Proposal 33: Allow airborne hunting of bears and wolves

Hunting animals from aircraft is both inequitable and unethical. It disrupts wildlife and may result in population declines that adversely affect the entire ecosystem. Bears reproduce infrequently, approximately every 4 to 6 years, and one-third of cubs fail to survive their first year, thus over hunting could rapidly diminish the population. This proposal is based on anecdotal theories of individuals rather

than sound scientific data. ADFG states that hunting should be avoided while a predator control program is in place, which it is. Since harvest objectives are being met, there is no reason to adopt extreme hunting techniques.

Wildlife viewers from around the world are following the Greater Mulchatna Predator Control Area predator removal program, as well as many of the proposals that are currently under review and are educating themselves about these matters. The tourism industry in Alaska suffered greatly during the Covid pandemic with many businesses being forced to shut down for good. While tourism is on the rebound, the state cannot afford to lose the economic benefit of the wildlife viewing public. According to the Alaska Travel Industry's *Alaska's 2022-2033 Visitor Profile* report, 66% of the total visitors stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who hire guides, 30% were sightseeing guides, 29% were wildlife viewing guides, 17% were fishing guides, and only 6% of guides that were hired were hunting guides. (Source: https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf)

A little over 20 years ago, the state was forced to back away from a wolf control program due to public outcry and threatened boycotts of the Alaska Tourism industry. With the commonplace use of social media, I believe that allowing airborne hunting in a region that is already conducting a controversial predator control program has the potential to trigger an economic catastrophe for the small businesses that depend on tourism dollars. According to the 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, there were 640,000 total non-consumptive wildlife-viewing participants in the State of Alaska that included both residents and non-residents. It was reported that these wildlife-viewers spent a total of more than $2 Billion in 2011, with the average participant spending about $3,200. (Source: https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

OPPOSE Proposal 34: Allow the same day airborne take of brown bear in Unit 17

Hunting animals from aircraft is both inequitable and unethical. It disrupts wildlife and may result in population declines that adversely affect the entire ecosystem. Bears reproduce infrequently, approximately every 4 to 6 years, and one-third of cubs fail to survive their first year, thus over hunting could rapidly diminish the population. This proposal is based on anecdotal theories of individuals rather than sound scientific data. ADFG states that hunting should be avoided while a predator control program is in place, which it is. Since harvest objectives are being met, there is no reason to adopt extreme hunting techniques.

Wildlife viewers from around the world are following the Greater Mulchatna Predator Control Area predator removal program as well as many of the proposals that are currently under review and are educating themselves about these matters. The tourism industry in Alaska suffered greatly during the Covid pandemic with many businesses being forced to shut down for good. While tourism is on the rebound, the state cannot afford to lose the economic benefit of the wildlife viewing public. According to

the Alaska Travel Industry's *Alaska's 2022-2033 Visitor Profile* report, 66% of the total visitors stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who hire guides, 30% were sightseeing guides, 29% were wildlife viewing guides, 17% were fishing guides, and only 6% of guides that were hired were hunting guides. (Source: https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf)

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OPPOSE Proposal 57: Increase the bag limit for brown bears

Hunters in 13 have the opportunity to choose between a spring or fall hunt. Should they wish to participate in both hunting seasons, there are ample opportunities to harvest a second bear in neighboring game management units. There is no data to support the hypothesis that the additional killing of brown bears in this area will increase the moose population. In the most comprehensive predator control report to date, *Efficacy of Killing Large Carnivores to Enhance Moose Harvests: New Insights from a Long-Term View* by Sterling D. Miller, David K. Person , and Terry Bowyer, the report states that no link was found between predator control programs and the increase in moose populations:

> "Regardless of how we sorted the available data we were unable to detect a positive relationship between kill numbers of any predator species and subsequent moose harvests. Neither did we find significant increases in mean moose harvests during two periods of official wolf predator control and a prior period. The long period encompassed by our analyses calls into question conclusions from shorter-term studies indicating that predator control in GMU 13 resulted in increased moose harvests. In short-term studies, there is a danger of accepting an apparent fit of observations to a preferred explanation. Our analyses demonstrate that a focus only on increased killing of predators to enhance harvests of moose can be a poor paradigm for management of moose in GMU 13 (and likely other areas). The 1997 National Research Council report evaluating predator control in Alaska concluded that, in part, many predator-control experiments had been insufficiently monitored, and that design of those experiments did not allow firm conclusions regarding the causes of subsequent changes in ungulate populations. The Council also recommended that wolves, bears, and ungulates be managed with an adaptive-management approach." (Source: https://www.mdpi.com/1424-2818/14/11/939)

OPPOSE Proposal 70: Extend the hunting season for brown bear in Units 14A and 14B

Baitingbears leads them to associate humans with a readily available food source, increasing the likelihood of dangerous encounters with people. The suggested extension of the bear hunting season coincides with the peak period when other recreational user groups are most likely to be present in the backcountry. Maintaining the bear season within its established time frame will reduce the likelihood of dangerous encounters with other recreationists who may inadvertently enter a bear baiting area. The National Weather Service reports that South Central Alaska is expected to experience below normal precipitation during the winter of 24-25. As a result, the snow pack is likely to diminish earlier this season compared to recent years, potentially leading to brown bears emerging from their dens sooner.

OPPOSE Proposal 71: Extend the brown bear hunting season in Unit 14B

Baitingbears leads them to associate humans with a readily available food source, increasing the likelihood of dangerous encounters with people. The suggested extension of the bear hunting season coincides with the peak period when other recreational user groups are most likely to be present in the backcountry. Maintaining the bear season within its established time frame will reduce the likelihood of dangerous encounters with other recreationists who may inadvertently enter a bear baiting area. The National Weather Service reports that South Central Alaska is expected to experience below normal precipitation during the winter of 24-25. As a result, the snow pack is likely to diminish earlier this season compared to recent years, potentially leading to brown bears emerging from their dens sooner.

There is no data to support the hypothesis that the additional killing of brown bears in this area will increase the moose population. In the most comprehensive predator control report to date, *Efficacy of Killing Large Carnivores to Enhance Moose Harvests: New Insights from a Long-Term View* by Sterling D. Miller, David K. Person, and Terry Bowyer, the report states that no link was found between predator control programs and the increase in moose populations: “Regardless of how we sorted the available data we were unable to detect a positive relationship between kill numbers of any predator species and subsequent moose harvests.” (Source: https://www.mdpi.com/1424-2818/14/11/939)

OPPOSE Proposal 75: Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan

I oppose proposal 75 for the following reasons: Unit 16 is located between Denali National Park, Denali National Preserve, Denali State Park, Lake Clark National Preserve, and Lake Clark National Park. These parks are used by both Alaskans and visiting recreationists and wildlife enthusiasts from around the world. According to the Alaska Travel Industry's *Alaska's 2022-2033 Visitor Profile* report, 66% of the total visitors to Alaska stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who

hire guides, 30% were sightseeing guides, 29% were wildlife viewing guides, 17 % were fishing guides, and only 6% of the guides that were hired were hunting guides. (Source: https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf)

Wildlife viewers from around the world are following the Greater Mulchatana Predator Control Area predator removal program as well as many of the proposals that are currently under review, including this one and are educating themselves about these matters. The tourism sector in Alaska experienced significant decline during the Covid pandemic, resulting in the permanent closure of numerous businesses. Although tourism is recovering, the state cannot forfeit the economic advantages provided by wildlife viewing enthusiasts.

Approximately twenty years ago, the state was compelled to back away from a wolf control program in response to public dissent and impending boycotts of the Alaska tourism sector. With the commonplace use of social media, I believe that if a predator control program such as this one was enacted, it could potentially trigger an economic catastrophe for small businesses that depend on tourism dollars.

According to the 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (2), there were in total 640,000 non-consumptive wildlife-viewing participants in the State of Alaska including both residents and non-residents. It is reported that these wildlife-viewers spent a total of more than $2 Billion dollars in Alaska in 2011, with the average participant spending about $3,200. Alaskan businesses cannot afford to lose this source of income. (Source: https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

There is no data to support the hypothesis that the additional killing of brown bears in this area will increase the moose population. In the most comprehensive predator control report to date, *Efficacy of Killing Large Carnivores to Enhance Moose Harvests: New Insights from a Long-Term View* by Sterling D. Miller, David K. Person, and Terry Bowyer, the report states that no link was found between predator control programs and the increase in moose populations:

> "Regardless of how we sorted the available data we were unable to detect a positive relationship between kill numbers of any predator species and subsequent moose harvests. Neither did we find significant increases in mean moose harvests during two periods of official wolf predator control and a prior period. The long period encompassed by our analyses calls into question conclusions from shorter-term studies indicating that predator control in GMU 13 resulted in increased moose harvests. In short-term studies, there is a danger of accepting an apparent fit of observations to a preferred explanation. Our analyses demonstrate that a focus only on increased killing of predators to enhance harvests of moose can be a poor paradigm for management of moose in GMU 13 (and likely other areas). The 1997 National Research Council report evaluating predator control in Alaska concluded that, in part, many predator-control experiments had been insufficiently monitored, and that design of those experiments did not allow firm conclusions regarding the causes of subsequent changes in ungulate populations. The Council also recommended that wolves, bears, and ungulates be managed with an adaptive-management approach. Those previously identified shortcomings in research design and implementation remain for most predator-reduction efforts conducted in Alaska prior to and after passage of the

Intensive Management Statute." (Source: https://www.mdpi.com/1424-2818/14/11/939)

The Operational Plan for Intensive Management of Moose in Game Management Unit 16 During Regualatory 2015–2017 plan prepared by the Division of Wildlife Conservation (4)) states that "A spatial analysis was also conducted that showed no relationship between bear harvest locations and calf survival within the Tyonek study area." (Source: https://www.adfg.alaska.gov/static/research/programs/intensivemanagement/pdfs/2015_gmu_16_intensive_management_operational_plan.pdf)

OPPOSE Proposal 76: Allow the take of brown bear in Unit 16, the same day airborne

The current law allows hunters to take two brown bears in unit 16 with no closed season in most of the unit. This is more than sufficient to provide the opportunity to harvest bears. Same day aerial hunting gives hunters an unfair advantage and goes against the fair chase/sporting ideology that hunting is based on. Giving hunters the ability to monitor an area with aircraft in real time will obliterate any remnants of the fair chase principle. Bears reproduce slowly, typically every 4 to 6 years and 1/3 of cubs do not survive their first year of life, so over hunting could rapidly decimate the population before action can be taken.

OPPOSE Proposal 77: Extend the brown bear season in Unit 14B

The current weather patterns are no longer influenced by El Niño. According to the National Weather Service, South Central Alaska will have below normal precipitation for the winter of 24-25, therefore the snow pack will disappear sooner this season than in other recent years and bears should return to their prior times for leaving their winter hibernation. Baiting bears with food teaches them to associate humans as a source of an easy meal which makes them more likely to get into dangerous conflicts with people. The proposed time block to lengthen the bear hunting season falls during the time period that other recreational user groups are most likely to be in the backcountry. Keeping the bear season at its current time frame will lessen the chance of a deadly encounter occurring to other recreationists who may unknowingly stumble into a bear baiting area.

There is no data to support the hypothesis that the additional killing of brown bears in this area will increase the moose population. In the most comprehensive predator control report to date, *Efficacy of Killing Large Carnivores to Enhance Moose Harvests: New Insights from a Long-Term View* by Sterling D. Miller, David K. Person, and Terry Bowyer states that no link was found between predator control programs and the increase in moose populations: "Regardless of how we sorted the available data we were unable to detect a positive relationship between kill numbers of any predator species and subsequent moose harvests." (Source: https://www.mdpi.com/1424-2818/14/11/93)

I am writing in response to the recent proposals brought before The Board of Game. Below, I have addressed some proposals, in numerical order, to explain my position on them.

SUPPORT Proposal 4: Establish general season, archery-only sheep hunts

I support this proposal due to the reasons that were presented by the author. Opportunities should be given to users of traditional methods of hunting. This proposal would help to avoid fatal injuries caused by stray bullets from other user groups. Archery hunting is challenging and typically has a low success rate, so over harvesting is not an issue. Encouraging the use of more traditional methods of hunting, hunters will be supporting the fair chase/sporting ideology.

SUPPORT Proposal 5: Reduce the nonresident bag limit for caribou

I support this proposal for all of the reasons that the author has stated. The caribou herd in this area is struggling due to numerous factors such as disease, past over grazing, environmental changes due to climate change, as well as poaching. In recent years, an Intensive Management project has been underway due to concerns regarding the size of this caribou herd. Restricting the bag limit for non-resident hunters would contribute to the recovery of this herd and enhance the availability of game for local subsistence hunters. Local residents depend on the caribou as a vital food source, which should take precedence over the desires of non-resident trophy hunters. This proposal will maintain the caribou herd for future generations.

SUPPORT Proposal 6: Shorten the nonresident caribou hunting season

I support this proposal for all of the reasons that the author stated. The caribou herd in this area is struggling due to numerous factors such as disease, past over grazing, environmental changes due to climate change, poaching, etc. For the last few years, there has been an Intensive Management project going on due concerns with the size of this caribou herd. Shortening the season for non resident hunters would help in the recovery of this herd and also provide more game for the local subsistence hunters. Local residents rely on the caribou as a food source, which should supersede the wants of non resident trophy hunters. Shortening the season for non-resident hunters would aid in the recovery of the herd while also providing more game for local subsistence hunters. Local residents rely on caribou as a food source, which should outweigh the desires of nonresident trophy hunters. This proposal will help to maintain the caribou herd for future generations.

Support Proposal 19 : Hunting Arctic fox on the Pribilof Islands

I support this proposal on the basis of the author's explanation of the problem. Arctic foxes are key to controlling small animal populations. Over hunting them could lead to a boom in rodents, which could upset the balance of the ecosystem and cause more problems for other animals as well as humans.

Support Proposal 20: Trapping Arctic fox on the Pribilof Islands

I support this proposal on the basis of the author's explanation of the problem. Arctic foxes are key to controlling small animal populations. Over trapping them could lead to a boom in rodents, which could upset the balance of the ecosystem and cause more problems for other animals as well as humans.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands which are home to a wide variety of fish and animal species. Over hunting them would result in the destruction of their habitats, which would have a negative impact on the ecosystem as a whole.

SUPPORT Proposal 22, Shorten wolverine hunting and trapping seasons

I support this proposal for the reasons given by the author. I believe the hunting season should coincide with the closure of trapping on February 28. This would give them the best chance at successful reproduction.

SUPPORT Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for the animals that depend on them.

SUPPORT Proposal 28: Reduce population and harvest objectives for moose in Unit 17B

I support this proposal for the reasons presented in this proposal.

SUPPORT Proposal 29: Review the population and harvest objectives for the Mulchatna caribou herd

In 2020, State biologists determined that the main reasons for the herd decline were disease, a lack of food as a result of climate change and past over grazing, as well as poaching. Changes in habitat and vegetation quality has likely reduced population potential since the last population objective was established. A new review should take this into consideration. A review of the population and harvest objective would provide valuable data to inform game management and provide directions for the Mulchatna Predator Control Program.

SUPPORT Proposal 30: Implement a three-year moratorium on caribou hunting in Units 17 and 19

I support this proposal for the reasons given in the proposal. The current population objective has been achieved only once. In 2020, state biologists determined that the main reasons for the decline were disease, a lack of food as a result of climate change and past over grazing, and poaching. The herd needs a resting period in order to help rebuild its numbers. A moratorium should take place along with a review of the population and harvest objective to provide valuable data to inform game management decisions. More action needs to be taken to protect the herd beyond the Mulchatna Predator Control Program.

SUPPORT Proposal 31: Close the resident caribou season in Units 9B, 17 and 19

I support this proposal for the reasons given in the proposal. The current population objective has been achieved only once. In 2020, state biologists determined that the main reasons for the decline were disease, a lack of food as a result of climate change and past over grazing, and poaching. The herd needs a resting period in order to help rebuild its numbers. A moratorium should take place along with a review of the population and harvest objective to provide valuable data to inform game management decisions. More action needs to be taken to protect the herd beyond the Mulchatna Predator Control Program.

SUPPORT Proposal 35: Shorten the trapping seasons for wolverine in Units 9 and 17

I support this proposal for the reasons given by the author of this proposal. The current hunting season for wolverine in Unit 17 extends into the denning period. When denning females with young are killed, this causes a population decline. Shortening the hunting season would give them the best chance at reproduction.

SUPPORT Proposal 36: Shorten the hunting season for wolverine in Unit 17 :

I support this proposal for the reasons given by the author of this proposal. The current hunting season for wolverine in Unit 17 extends into the denning period. When denning females with young are killed, this causes a population decline. Shortening the hunting season would give them the best chance at reproduction.

OPPOSE Proposal 58: Reduce the minimum wolf population in the Unit 13 Intensive Management Plan for wolves

Wolf control programs have not been successful for boosting caribou numbers in other parts of the state. A wolf control program had been going on for 12 years in the Mulchatna Caribou Herd Predation Management Area, but the caribou population continued to drop. It would be prudent to first collect and examine data to determine if the hunting closure of the Nelchina caribou herd has had a positive impact on the population before a further reduction of the wolf population takes place.

OPPOSE Proposal 59 Lengthen the wolf trapping season in Unit 11

Wolves are still shedding out their coats at the beginning of August and have not grown into their winter coats. A wolf in this condition would provide little economic value.

SUPPORT Proposal 61: Change the start date for the ptarmigan hunting season in Unit 13B

I believe that the ptarmigan hunting season should coincide with the time when the juvenile birds have sufficiently grown enough to be usable for human consumption, as stated in the proposal.

OPPOSE Proposal 78 Allow the same day airborne take of wolves in the active, Unit 16 Intensive Management Plan

This proposal would only encourage the rapid over harvesting of wolves in the area. ADFG states that hunting should be avoided while a predator control program is in place, which it is. Restricting same day airborne to ADFG staff and approved pilots will enhance oversight and accountability.

OPPOSE Proposal 79 Extend the wolf trapping season in Unit 14A

The snow pack is often too rotten in the month of May for safe travel. With the sudden weather changes, traps may become inaccessible and unable to be checked.

SUPPORT Proposal 80: Require sealing of beaver taken in Unit 16:

I support this proposal for the reasons given in the proposal. Implementing this proposal will help to gather data on a declining population which will help to guide any future actions.

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SUPPORT Proposal 81 Require traps and snares set within two miles of publicly maintained roads in Unit 14A be checked at least every 36 hours

I support this proposal for all of the reasons listed in this proposal. Traps that are near publicly maintained roads are easily accessible to their owners and will not cause an undue hardship to them by frequent monitoring. Traps that are set near roadways are more likely to catch domesticated animals than those that are in the back country. The frequent checking of traps can help to mitigate future conflicts.

SUPPORT AS AMENDED Proposal 82: Establish 50-yard trapping setbacks along specific trails in Unit 14

I support this Proposal with an Amendment to add the following trail systems to the list:

West Gateway trail system in Unit 14A

Crevasse-Moraine trail system in Unit 14A

I believe that this proposal is a pragmatic solution that would help to resolve a decades long conflict between user groups. The trails that are listed within this amended proposal are the most heavily trafficked trails in the Matanuska -Susitna Valley by numerous user groups. I have observed that in the past, discussions of trapping setbacks was boiled down to the theory that user conflicts are simply a loose dog problem. Trail users venture off of the main trail for a number of reasons such as avoiding moose in the trail; collecting berries, mushrooms and antlers; bathroom breaks; walking around downed trees or muddy areas; etc.. Setbacks keep trail users safe and still give access to the area by trappers. The way the current law is written, trappers can legally place traps anywhere near a trail or even on a multi use trail. In the Wasilla area, a neighbor of my friend almost stepped in a leg hold trap that was placed in the middle of a trail. Luckily for her, her husband was a trapper so she noticed indicators of a nearby trap. The vast majority of the trail using public does not have her knowledge base and most likely would have been injured. While dog mushing on a groomed trail in the West Gateway trail system, a friend of my friend reported that he once had to walk ahead of his team in order to move snares that were overhanging the trail. His dogs were tethered and did not leave the hard packed groomed trail yet they nearly became

victims. By creating trapping setbacks and making these trails known to the public, trail users would know which trail systems were “safe” and this knowledge would draw users to them. The usage on the no set back trails would potentially go down and this would lessen potential conflicts on the trails that have no setbacks.

I have amended the proposal for the following reasons:

The West Gateway trail system in Willow is heavily used year round by various user groups who travel to the Willow area from all over South Central Alaska to recreate there. Many Alaskans own second homes and cabins in the community. Both private users as well as a number of commercial guiding companies use these trails on a daily basis. The West Gateway trail system is the most heavily used trail system in the Willow area. This trail system is groomed and maintained by the Willow Trail Committee. The Willow Trail Committee sponsors an annual “Willow Trails Challenge” where trail users can win prizes by visiting all of the trails in the trail system. These events take place in both the winter and summer months to encourage the use of the trails that are seasonally available. Within Willow, there are four different trail systems: The West Gateway trail system, the Haessler-Norris trail system, the Emil Stancec trail system, and the Nancy Lake Recreation Area. This means that local trappers would have several close by trail options that would have no setbacks and this amended proposal would not cause any hardship to them. The boundaries for the proposed trail system setbacks would be the Parks Highway to the east, Willow Creek to the north, the Susitna River to the west and the Nancy Lake State Recreation area to the south. The Old Hunter's trail would be the farthest south trail to be included in this amended proposal.

I amended the proposal to include the Crevasse-Moraine Trail System because it is a heavily used trail system that is interconnected with the Matanuska Lakes State Recreation Area developed trails that are already listed in the Proposal.

PC175

Name: Rhonda Leonard

Community of Residence: Florida

Comment:

This is concerning the proposal #18 and #75 in particular. I believe the season should be shortened if not stopped completely. As for the culling of bears and wolves, seriously? I went to Alaska this year for 2 reasons, 1 - to see so much wilderness that exists almost no where else in the US and 2 - to see wildlife in their natural environment. I saw only 3 bears, a mom with 2 yearling cubs, grizzly's and heard of several sightings of wolves. I did hear wolves on a couple of occasions, the sound was amazing.

Humans have already encroached on most wildlife to the point some species are near extinction, they have very few places left where they can thrive.

To kill them to allegedly increase the population of another species, and in the manner suggested is cruel and inhumane. I have seen no scientific research that says this is the best means possible to control population.

Please do not allow this to happen again.

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Sue Leporati DATE: 12/27/24

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

I have addressed each proposal in numerical order below and outlined concerns regarding sustainability and/or safety concerns.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce

much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

SUPPORT WITH AMENDMENT Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

SUPPORT WITH AMENDMENT Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

SUPPORT WITH AMENDMENT Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

SUPPORT WITH AMENDMENT Proposal 29: Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

SUPPORT WITH AMENDMENT Proposals 65, 68, 69:

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

SUPPORT WITH AMENDMENT Proposal 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for your attention.

NAME: Sue Leporati

Community of Residence: Brunswick Ohio

PC177

Name: Tom Lessard

Community of Residence: Cooper Landing

Comment:

Proposal 81 (require 36 hour trap check)

Oppose.

Most trappers utilize lethal trapping methods to humanely dispatch catches in short order. Snow, rain and other weather can make travel unwise and unsafe. Furbearer movement can be erratic with considerable stretches of no activity during which time it would be wasteful and expensive to continually check empty traps. If the elimination of trapping is the end game, this would be a great way to do it. It is best to allow the trapper to manage their lines without undue restraint.

Proposal 82 (50 yard trap setbacks)

Oppose.

I was one of the participants in the workshop from which this proposal derives. I am very supportive of allowing dog safe trapping methods (elevated, enclosed, under water, under ice, etc) practically anywhere. The proposal states the reason they want setbacks is to make things safe for loose running pets which in my opinion almost always means dogs. I have 2 main concerns. First, my understanding is the BOG lacks authority to make regulations based on public safety concerns. 2nd is that the BOG also has no authority to issue regulations regarding dogs which should always be the flip side of the coin when trapping restrictions are considered due to loose dogs. To wit, if trapping restrictions are implemented there should also be tight leash laws simultaneously enacted.

PC178

Name: Lynne Lewis

Community of Residence: Colorado

Comment:

I am in FAVOR of proposition 11. Please shorten the season. I especially agree with the author's comments,

"Shortening the season allows for the last of the other user groups to exit the popular rivers and lakes where hunting takes place. In the Department of Fish and Game's 2022 comments, they wrote that "The department and Board of Game have for decades supported short seasons and reduced bag limits for nonresident and resident hunters in Unit 9 for bear conservation and hunt quality. The management objective for bears in all of Unit 9 is to maintain a high bear density with a sex and age structure that will sustain a harvest composed of 60% males, with 50 males 8 years or older taken during the combined fall and spring seasons. " Also, at issue is whether it is ethical to sport hunt animals that are habituated to humans. The bears hunted on Moraine, Funnel and Kulik Rivers are known worldwide. Photographers, film crews and other visitors pay thousands of dollars a day to view and photograph these bears. They are used to the presence of humans: sows will nurse their cubs next to fishermen and wildlife viewers. Many

of the bears are known individually by guides and visitors alike. Much of the visiting public is unaware that these bears will be hunted later in the season." It is inhumane to hunt habituated bears.

I am a PhD economist have done human surveys in this area and done extensive research on the economic value of these bears to humans. Many visitors connect with these individual bears and do not support such hunting and thus I support a shorter season.

PC179

Name: Ron Linder

Community of Residence: Wasilla

Comment:

I am in support of proposal 50 and the amendment that Kolton Eischens had made to making ds165 go back to harvest ticket for residents. splitting the unit to provide some non motorized access for hunters. I believe this will give more opportunity and keep the trophy quality that the chugach is known for.

PC180

Name: Michael Litzen

Community of Residence: Kenai Pennisula

Comment:

I have been guiding brown bear hunters in GMU 9-D for 44 years all on the lower AK Peninsula on the south side. During all of those years the population of brown bears has been strong as that region has always had healthy salmon runs especially pink salmon. My guide operations observations from the May 2024 season was no exception. We saw heavy numbers of sows and cubs. I'm strongy in favor of proposal #9 that seeks to change the current season dates from May 10-25th in even years to May 10-31 and the fall season in odd years from Oct 7-21 to October 1-21.

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 10, 18, 19, 20, 29, 65, 68, 69

NAME: Wendy Lombardo DATE: 12/10/24

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

OPPOSE Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more.

OPPOSE Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk.

OPPOSE Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67,

Support with Amendment 65, 68, 69

OPPOSE Proposals 70 to 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

NAME Wendy Lombardo

ADDRESS [redacted]
South Windsor, CT 06074

PC182

Name: Anna Loving

Community of Residence: Oregon, USA

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

ANNA LOVING DECEMBER 24, 2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Although I am not a resident, Alaska, its outdoor activities and its ecosystems are dear to me and to many Americans in the Lower 48. Two of my great loves are mushing and following the bears of Brooks Falls through the Explore.org cams. I've never been able to visit, but am hoping to do so several times once my husband and I retire in the next few years. Beyond my own love of Alaska, it is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. I believe that these animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Brown bears reproduce slowly—only every 4 to 6 years—so although the brown bear population is stable, this proposal interferes with its continuance. I did a quick Google search, and last year, 25,000 to 37,000 came just to Brooks Falls in Katmai to see the living

bears, but only 4,500 hunting permits were issued for the entire State of Alaska. Protecting bears is better for Alaska's economy because at least 5 times more tourists come to see them alive than to kill them. Besides that, there are over one million people who participated in online voting for "Fat Bear Week" this year, in 2024. If those bears that they love would be hunted, the dismay would be worldwide.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not ethical or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling. Growing up in a hunting family, my parents taught me that using things like that wasn't "fair."

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to be more careful with the bear population's stability. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most

populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

SUPPORT WITH AMENDMENT Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on bear populations. Again, tourists are much more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

SUPPORT WITH AMENDMENT Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

SUPPORT WITH AMENDMENT Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

SUPPORT WITH AMENDMENT Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance and increasing the likelihood of negative human/bear interactions.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67 Changes to moose hunting

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

SUPPORT WITH AMENDMENT 65, 68, 69 changes to moose hunting

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

SUPPORT WITH AMENDMENT 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

Anna Loving

[redacted]

Newberg, Oregon 97132

PC183

Name: Leigh Lubin

Community of Residence: Valdez

Comment:

I strongly oppose the proposed predator control program, proposal 75. Predators have been shown repeatedly over time through scientific studies and traditional knowledge systems to be integral aspects of the ecosystem and integral for maintaining healthy herbivore populations. If any predator control is needed, it needs to be directed to moose hunting permits and limited to subsistence hunters in remote areas who depend on herbivores for food and don't have other options.

I am shocked that the National Park System and ADFG continue to entertain the idea that humans can successfully manage populations. With the drastic and inconsistent weather changes due to global climate change, any models or presumptions regulators have about the ecosystem and the codependence and interaction among the plant and animal populations is unreliable and unrealistic. I urge you to allow the predator populations to naturally adjust to the herbivore populations and vice versa.

The types of predator control programs you are suggesting are not reversible. I strongly oppose proposal 75.

I also strongly oppose proposals 2 and 3. Bear baiting and using technology to assist in bear baiting exhibits no hunting skills and is a danger to members of the state such as myself who frequent public lands to recreate remotely by human powered means. On more than one occasion I hand encountered bear baiting stations as I have explored public lands. On many occasions, these locations had excessive trash around the baiting station. Additionally, I feel song that my personal safety is jeapordized by these practices.

PC184

Name: Mark Luttrell

Community of Residence: Seward

Comment:

I fully support proposal Proposal 82 - Palmer Trapping Setbacks. This proposal will establish a 50-yard trapping setback along specific trails in the Mat-Su area, particularly ones that are heavily used for recreational purposes. These trapping setbacks will help keep dogs and people safe from incidental trapping. The setback proposal is a result of a 2022 day long meeting between trappers and non-consumptive recreators with dogs and pets. The killing and maiming of family members v the rights of trappers has always been contentious. Proposal 82 will build on the consensus of rare meeting of theses two opposing user groups in Mat-Su. I fully support the reasoning and effort of the Alaska Wildlife Alliance. I've been a member for decades.

PC185

Name: Edward Macan

Community of Residence: Eureka

Comment:

I oppose Proposal 33, same day airborne killing of wolves and brown bears in Unit 17, which violates fair chase methods and gives hunters an unfair advantage over their target species. I strongly oppose Proposal 59, which asks for a longer wolf trapping season in Unit 11. Traps are inherently nonselective, injuring and killing countless nontarget animals annually, including endangered and threatened species, family pets, and people who attempt to release a trapped animal. In their comments, ADFG even acknowledges that extending the trapping season poses a risk to non-target species. I oppose Proposal 79 for the same reason. More generally, there is no reason for the State of Alaska to "manage" the populations of large carnivores such as wolves and brown bears; nature already does this, and much better than wildlife departments ever will.

PC186

Name: Jeff Chadd, Majestic Mountain Outfitters, Inc.

Community of Residence: Forsyth, Montana

Comment:

Proposal 11 Comments

There is no biological data to support this kind of change to the season and harvest of bears. In the last 10 years the number of bear viewing and fishing lodge users in the Katmai Preserve has grown exponentially. They utilize the Preserve the months of June – September for bear viewing and fishermen whereas the hunters only have 21 day season in October with very small number of user days.

The hunters have very little impact on habituating the bear population whereas the bear viewers and fishing lodges in their large numbers of users and days in the field have a greater impact on the habituating the bear population to human presence.

In addressing "User Conflicts" and "Public Safety" portion of this proposal, there is hunting allowed in the Preserve only, and the fishing and bear viewing users can go into the hard Park where hunting in not allowed. That would solve any possible conflict issues for the 7 days of the hunting season we are discussing.

PC187

Name: Deven Malutin

Community of Residence: Wasilla

Comment:

Proposal 70:

I support this proposal because where I bait and have trail cameras in unit 14A I have seen a decreasing number of moose and moose calves while a dramatic increase of brown bears. While I have also noticed that I have not had brown bears at my bait until mid June at the earliest. Giving hunters a longer brown bear season to at least June 15 but in my opinion June 30 would let hunters have a better chance at harvesting a brown bear and help the increase the moose population

Proposal 66:

I support this proposal because adding a late season archery moose hunt would allow archery hunters an opportunity to potentially harvest a moose with low impact to the moose population.

PC188

Name: Anthony Marchini

Community of Residence: Wasilla

Comment:

There are multiple proposals that go along the same principle and I agree with them. I support proposals 5,7,9,12,13,14,15,16 & 17. I researched what I could through the fish and game website and since the shortened season (while only fall stats are available) the sow take has increased in unit 9 with the shortened season. This is the opposite effect of why it was shortened in the first place. With a longer season there is more time to be selective on mature boars.

The main reason I think the season should be lengthened however is for the local communities down on the peninsula. During bear season once a year every available seat on every carrier is taken up with bear freight, hunters, guides or packers. With the compressed season the demand for space available is past capacity. This makes it harder for locals to get there groceries & supplies as well as travel themselves to and from Anchorage.

In summary adding a week to both spring and fall seasons would decrease the pressure on air services helping local communities and hunters both. Allow for greater time to selectively harvest mature boars. It would also allow local communities more time to gain revenue from hunters.

PC189

Name: Bruce Markwood

Community of Residence: Anchorage

Comment:

I am opposed to proposal numbers 51 and 52. I have observed the management of sheep hunting on McColl ridge for many years. I feel like McColl ridge is an area that continues to have stable sheep population. I think any changes to this area could produce effects that are undesirable.

PC190

Name: Joe Marsala

Community of Residence: JBER

Comment:

As an Alaska resident, I strongly oppose Proposal 75 because it would harm our wildlife and disrupt the natural balance of our ecosystems. I support Proposals 29, 11 and 82 for their role in protecting bears, wolves and the safety of our public lands.

PC191

Name: Maria McGlashan

Community of Residence: Lodi, OH

Comment:

Proposal 79 – OPPOSE

The concept that state-sanctioned killing of wolves is necessary to control wolf populations is one of the most widespread assumptions in large carnivore management but research demonstrates that wolves limit their own numbers. Wolves don't decimate wild ungulate populations and they don't pose threats to human safety. So why does Alaska continue to get away with outdated and incorrect management practices?

PC192

Name: William McMullin

Community of Residence: Oak Park

Comment:

Support Proposal 82 to keep pets safe from traps.

Support proposal 11. This proposal would restore the hunting season to the pre-2022 length and would reduce human-wildlife conflicts.

Support proposal 29. The MCH has been on a sharp decline since the late 1900s, plummeting from 200,000 animals to an estimated 30,000 in 2019.

PC193

Name: Siobhan McNally

Community of Residence: Brooklyn

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69

NAME: _____Siobhan McNally DATE:__12-20-24___

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be

allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67,

Support with Amendment 65, 68, 69

OPPOSE Proposals 70 to 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

NAME

ADDRESS

PC194

Name: Mary McTague

Community of Residence: Cobb

Comment:

Oppose proposal 17

PC195

Name: Michelle Metallidis

Community of Residence: CA

Comment:

Prop 75+76: State twice the size of Texas and you can't manage a wolf population of 120? Sounds like hunters who want an excuse or helicopter companies looking to profit. California learned the hard way what killing wolves and bears did to our ecosystem. Still recovering 50 years on. Don't ruin your ecosystem that's already getting hit hard by climate change.

PC196

Name: Michael Metcalf

Community of Residence: Anchorage

Comment:

I support proposal 3 of allowing cellular trail cameras for bear baiting. I have used this technology in Idaho and the amount of information it provided was priceless enabling me to focus on taking on the right bear. We have an excess of bears evidence by the amount of aerial gunning Required. Allowing cellular cameras will bring in another generation of bear hunters and give people reasons to get excited about hunting bears which is essential if we want to keep the moose.

I also support proposal 70 of extending seasons on bears

PC197

Name: Dakota Millard, N/A

Community of Residence: Fairbanks

Comment:

I would like to voice my support for proposal 52. The Alaska state constitution states in Article 8 "The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people." The critical wording here is "its people" which refers to all of the residents of the state of Alaska. The current situation surrounding sheep hunting in the area impacted by proposal 52 makes it extremely difficult for an average resident to gain access. Special interest and the commodification of state owned wildlife resources by a single entity to sell to non residents has proven effective in severely limiting resident access to MaColl ridge for sheep hunting. Flight services in the area refuse to drop off resident hunters in any area that the nearby outfitter specifies, and foot access is simply not feasible. The result of this situation is the monopolization for monetary gain of a publicly owned resource which is constitutionally mandated to be managed for the benefit of the residents of the state of Alaska. Adopting proposal 52 will allow Alaska residents access to their resources, and bring resource management into alignment with the state constitution.

PC198

Name: Elizabeth Mitchell

Community of Residence: Anchorage

Comment:

As an Alaska resident, I strongly oppose Proposal 75 because it would harm our wildlife and disrupt the natural balance of our ecosystems. I support Proposals 29, 11 and 82 for their role in protecting bears, wolves and the safety of our public lands.

PC199

Name: Bill Mohrwinkel

Community of Residence: Palmer

Comment:

Proposal 75 OPPOSED. This proposal is not, as it should be, based in science. It is taking a complex issue and relying on the idea if you kill all the predators, it will increase the ungulate population. Multiple studies have disproved this. This is a political proposal and should not be adopted. Also this would be insanely expensive, money spent better elsewhere.

Proposal 82 SUPPORT. While trapping has historically been an import part of Alaska's history, unethical, weekend hobby trappers, using our trails and road system as "traplines" has become a problem. Trapping is an activity that should be done well away from high-use areas and as our population has increased in the Mat-Su Borough, there have been more conflicts and incidents with dogs getting killed or injured by traps set on or near trails. No ethical trapper would trap anywhere near a recreational trail.

Proposal 11 SUPPORT. The lengthening of the season in 2022 increased user conflict with fisherman and wildlife viewers. Going back to the original season length would reduce that conflict.

Proposal 29 SUPPORT. Predator control has not been scientifical proven to increase ungulate populations. It has not be proven that predation was the main cause of the decline in the population of the MCH. State Biologist have clearly determined the decline was due to disease and lack of food caused by climate change. A review of the population objective would be helpful information when deciding on a management plan.

PC200

Name: Dan Montgomery

Community of Residence: Wasilla

Comment:

Thank you Chairman and Board members for this opportunity to comment on these proposals for region 4.

My name is Dan Montgomery and I am a 42 year resident of Alaska. I lived in Southeast Alaska from 1982 to 1985 in Juneau. I lived in Kotzebue in the Arctic from 1985 to 1993 and have lived in Wasilla in the MAT-SU valley since 1993. I started assistant guiding in the southern Wrangell mountains in unit 11 in 1985 and became a registered guide in 1993 and started my own business and guiding fulltime that year in units 13D and 14C and unit 9E in 1995.

I support Proposal 5. One bull caribou a year from this small herd is all that is necessary and will leave more caribou on the land for the next hunter. Most non-residents are guided and the guides can book more hunters without overhunting the herd with a one bull limit.

I support Proposals 9,12,13,14,15,16and17. I authored proposal 13. The Brown bear seasons in 9D and 9E were shortened by 6 days at the Board of Game meeting in Dillingham in 2018. I believe we had a sever die off of younger bears and sows in the winter off 2011-12 for whatever reason in the southern half of 9E and most of 9D. We saw very few sows with cubs or single young bears in the years leading up to 2018 in our area around Port Heiden. The idea behind shorting the season was to protect the sows in the population and speed the bears recovery. I think it has achieved this goal. We are seeing many more sows with cubs and a very good number of young boars these days and it is time to restore the seasons back to their former lengths.

I support Proposal 54. I co-authored this proposal with Herb Mansavage. I have guided every year in this area since 1992. This area, hunt numbers DS160 and DS260 was created in 2008 when all of 13D was made into draw permit hunts because of a severe winter die off in the winter of 2005-06. These hunt areas along with 14A were made into any ram units as an experiment in managing sheep. The idea was to issue fewer permits and take some of the hunting pressure off of the full curl rams and have more mature rams on the mountain. It has worked some what. Unfortunately, we are still experiencing severe winters with icing events and extremely deep, heavy, wet snows. This has caused the lowest sheep population ever counted in this area, with parts of it almost devoid of sheep. I don't think we can justify still having an any ram hunts with this very low ram population. With an any ram bag limit you could theoretically kill every ram in the area. I support making this area full curl to protect the immature rams from being harvested before they have even had a chance to breed and pass on their superior genetics. In my oppinion with this sheep population so low we need to do everything we can to conserve and protect these young rams.

I support Proposal 55. The goat population has crashed in 13D in the last 4 years. The Dept. has gone from issuing 35 permits to only issuing 8 now. By splitting up the unit into smaller hunt areas it will spread what little opportunity there is left more evenly over this huge area. It will prevent over harvesting in the areas with easier access.

I oppose Proposals 10 and 11. These are simply an attempt to exclude non-residents from hunting sheep in a small part of unit 11 so that residents can hunt them without having to compete with guided non-residents. This is an exclusive guide use area with only one guide and this proposal is completely unnecessary and would also exclude 2nd degree of kindred hunters.

I oppose Proposal 49. The Dept. counted over 12,000 caribou this year in this herd and I think the Dept. should issue about 300 bull only Tier II permits this year. This would have no effect on the population of the herd and allow local resident to put some valuable meat in their freezers.

I oppose Proposal 53. There would be almost no access because of snow in this area this time of year and there would be virtually no opportunity to harvest a full curl ram after the rifle hunting season because of the extremely low number of full curl sheep in this area.

I oppose proposal 56. There are very low goat numbers left in this population and there is no justifying putting more hunting pressure on them. The Knik area in 14C has an archery only hunt with the same dates and is an over the counter registration hunt that is open to everyone and there are lots of goats and very few people hunt it.

I oppose Proposal 73. This proposal would chance the bag limit for sheep in part of 14A back to any ram from full curl. This was just changed from any ram to full curl last cycle by this board and we have only had 2 seasons under full curl management and it is much too early to consider changing it back. We are

just beginning to see some good numbers of full curl sheep in the area because now they have a much better chance of getting older.

I Oppose proposal 74. There would be almost no opportunity for success on this hunt if it were to pass because of the very low number of full curl sheep in this area, especially after the rifle season. There already is an area wide late archery draw hunt in 14C that has 57 resident any ram permits in it. They have about a 1 in 6 chance of drawing one. There is easy access in almost all of the units and less than half of the resident permit holders even hunt.

Thank you for your time and effort considering these proposals.

Dan Montgomery

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PC201

Name: Ji Montgomery

Community of Residence: Pennsylvania

Comment:

Oppose killing all the wolves and bears and other animals they are endangered by killed off.. don't allow proposal 17 as it put lives of animals at harm

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PC202

Name: Heather Moore

Community of Residence: Willow, AK

Comment:

I am writing in response to the recent proposals brought before The Board of Game. Below, I have addressed each proposal in numerical order to explain my position on them.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions:

Permitting hunters to harvest bears without incurring a fee diminishes the financial resources needed to fund wildlife protection and maintain a healthy population. Fees serve as a crucial revenue source for the state, contributing to the funding of ADFG programs. Fees enhance accountability among hunters and supply valuable data for researchers. Bears have a slow reproductive rate, typically giving birth every 4 to 6 years, with approximately one-third of cubs not surviving their first year. Consequently, over hunting poses a significant risk to the population's stability. Fees serve as an additional framework to assist in preventing over harvesting.

Further, the economy in game unit 9 is significantly influenced by the tourism generated from bear viewing activities. Preserving bear populations is advantageous for Alaska's economy, as tourists are drawn to observe them in their natural habitat rather than in a deceased state. A study released by the University of Alaska Fairbanks titled "The Economic Contributions of Bear Viewing in South Central Alaska"1 revealed that wildlife viewing at Katmai National Park and Preserve and Lake Clark National Park and Preserve generates a combined annual contribution of 135.5 million dollars to the Alaskan economy.

Alaska must exercise caution to avoid over harvesting the bears in this region if we wish to maintain the ecological balance of this region, which will benefit both the hunters, bear watchers, and the wildlife. Not requiring hunting fees reduces the ADFG's ability to manage the state's resources and fees provide an additional set of guardrails to help in preventing over harvesting. Eliminating fees may cause a detrimental impact on the depatment's ability to operate, with the ongoing state funding issues. Furthermore, the proposal is short-sighted because it does not take into consideration loss of the tourism revenues. 1 https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf

OPPOSE Proposal 2: Open two bear baiting seasons :

Baiting bears with food teaches them to associate humans as a source of an easy meal which makes them more likely to engage in dangerous conflicts with people. Keeping the bear baiting season to one time block in the spring will lessen the chances of a deadly encounter occurring to other recreationists who unknowingly stumble into a bear baiting area. The proposed time block for a second bear baiting season falls during the the time period that other recreational user groups are most likely to be in the back county. Since nineteen out of twenty-six game units in Alaska have no closed season for black bears, bear hunters will still have access to other areas to hunt bears.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and contradicts the fair chase/sporting ideology that underpins hunting. In addition, giving hunters the ability to monitor an area with cameras in real time, just as they can monitor their home from anywhere using security cameras, will eliminate any vestige of the fair chase/sporting principle. The use of bait stations already gives hunters an advantage when hunting bears. Allowing live cameras has the potential to decimate the population. If we want to maintain an ecological balance and preserve our wildlife for future generations, then this board should not allow the use of cellular cameras for bear hunting.

SUPPORT Proposal 4: Establish general season, archery-only sheep hunts

I support this proposal due to the reasons that were presented by the author . Opportunities should be given to users of traditional methods of hunting. This proposal would help to avoid fatal injuries caused by stray bullets from other user groups. Archery hunting is challenging and typically has a low success rate, so over harvesting is not an issue. Encouraging the use of more traditional methods of hunting, hunters will be supporting the fair chase/sporting ideology.

SUPPORT Proposal 5: Reduce the nonresident bag limit for caribou

I support this proposal for all of the reasons that the author ha stated. The caribou herd in this area is struggling due to numerous factors such as disease, past over grazing, environmental changes due to climate change, as well as poaching. In recent years, an Intensive Management project has been underway due to concerns regarding the size of this caribou herd. Restricting the bag limit for non-resident hunters would contribute to the recovery of this herd and enhance the availability of game for local subsistence hunters. Local residents depend on the caribou as a vital food source, which should take precedence over the desires of non-resident trophy hunters. This proposal with maintain the caribou herd for future generations.

SUPPORT Proposal 6: Shorten the nonresident caribou hunting season

I support this proposal for all of the reasons that the author stated. The caribou herd in this area is struggling due to numerous factors such as disease, past over grazing, environmental changes due to climate change, poaching, etc. For the last few years, there has been an Intensive Management project going on due concerns with the size of this caribou herd. Shortening the season for non resident hunters would help in the recovery of this herd and also provide more game for the local subsistence hunters. Local residents rely on the caribou as a food source, which should supersede the wants of non resident trophy hunters. Shortening the season for non-resident hunters would aid in the recovery of the herd while also providing more game for local subsistence hunters. Local residents rely on caribou as a food source, which should outweigh the desires of nonresident trophy hunters. This proposal help to maintain the caribou herd for future generations.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening the hunting season will create the potential for dangerous conflicts with other user groups who also flock to the area. Fishermen and other users can accident y be shot at or have a bear driven towards them by a hunting party. Lengthening bear hunting seasons puts too much pressure on bears and other animals in an area with a short time frame for them to take advantage of the summer's nutritional resources.. Bears reproduce slowly—only every 4 to 6 years and 1/3 of cubs do not survive their first year of life, so over hunting could rapidly decimate the population. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The revenue that is created by fishing and wildlife tourism surpasses the economic benefits derived from extending the bear hunting season. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. According to the Alaska Travel Industry's Alaska's 2022-2033 Visitor Profile report (1) , 66% of the total visitors stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Among the visitors who hire guides, 30% were sightseeing guides, 29% were wildlife viewing guides, 17% were fishing guides, and only 6% of guides that were hired were hunting guides. Clearly, Alaska cannot afford to alienate it's wildlife viewing visitors in order to accommodate just 6% of its total visitor base. 1
https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf

Support Proposal 10: Close Unit 9A to nonresident brown bear hunting

I support this proposal for all of the reasons that the author has stated.Bears have a slow reproductive rate, typically giving birth every 4 to 6 years, and approximately one-third of cubs do not survive their first year, so over hunting would take years for them to recover from. ADF&G has not conducted a Unit 9A brown bear population or density surveys in recent decades so the health of the population is unknown. The economy in game unit 9 relies significantly on the income generated by bear viewing. Preserving bear populations is advantageous for Alaska's economy, as tourists come to see them alive, not dead. A study published by the University of Alaska Fairbanks - The Economic Contributions of Bear Viewing in South Central Alaska (1) found that wildlife viewing for Katmai National Park and Preserve and Lake Clark National Park and Preserve

contributed a yearly combined total of 135.5 million dollars to the Alaskan economy. 1https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf

Support Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

I support this proposal for all of the reasons that the proposal has stated. A longer hunting season creates more dangerous conflicts with other user groups who also flock to the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters occupying essential habitats where bears fish will negatively impact the survival of all species reliant on salmon, as well as harm the ecosystem that relies on the nutrients provided by fish remains and animal waste. IHunting animals that have become accustomed to human presence raises significant ethical concerns. The economy in game unit 9 relies significantly on the tourism generated by bear viewing. The prolonged hunting period restricts the safe usage of the area for other user groups and primarily benefits one group to the detriment of all others. Preserving bear populations is advantageous for Alaska's economy, as tourists are drawn to witness these animals in their natural habitat rather than in a deceased state. Killing well-known bears in front of wildlife viewers will tarnish the state's reputation among current and prospective wildlife enthusiasts globally, leading to a decline in visitation. The economic consequences will result in a more significant negative impact on the state than can be offset by the financial contributions of trophy hunters during an extended bear hunting season. The Alaska Travel Industry's 2022-2023 Visitor Profile (1) report indicates that 66% of total visitors identified wildlife viewing as one of their primary activities. Additionally, 30% specified bear viewing as a primary activity, while only 6% noted hunting as a primary activity. Among the visitors who employed guides, 30% opted for sightseeing guides, 29% chose wildlife viewing guides, 17% selected fishing guides, and a mere 6% hired hunting guides. 1 https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

An extended hunting season may lead to potential conflicts with other user groups that also engage in activities within the area. It is unreasonable to assume that an extended hunting window will not attract a greater number of hunters to the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Prior to extending the hunting season, it is essential for biologists to conduct a study to assess whether the bear population has genuinely recovered. At present, there are no baseline studies available regarding the population of bears in this region of the state. This proposal relies on anecdotal observations from individuals who stand to gain financially from its approval, rather than on robust scientific data. Protecting bears is better for Alaska's economy because tourists come to see them alive, not

dead. To have well known bears killed in front of wildlife viewer will give the state a black eye in the minds of both present and future wildlife viewers worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact on the state than the longer bear hunting season can be compensated for by trophy hunter's dollars. A study published by the University of Alaska Fairbanks - The Economic Contributions of Bear Viewing in South Central Alaska (1) found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. This proposal poses a threat to both the bear population and the local economy. 1 https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons and bag limits in Units 9D and 9E for residents and nonresidents

An extended hunting season may lead to potential conflicts with other user groups that also engage in activities within the area. It is unreasonable to assume that an extended hunting window will not attract a greater number of hunters to the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Prior to extending the hunting season, it is essential for biologists to conduct a study to assess whether the bear population has genuinely recovered. At present, there are no baseline studies available regarding the population of bears in this region of the state. This proposal relies on anecdotal observations from individuals who stand to gain financially from its approval, rather than on robust scientific data. Protecting bears is better for Alaska’s economy because tourists come to see them alive, not dead. To have well known bears killed in front of wildlife viewer will give the state a black eye in the minds of both present and future wildlife viewers worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact on the state than the longer bear hunting season can be compensated for by trophy hunter's dollars. A study published by the University of Alaska Fairbanks - The Economic Contributions of Bear Viewing in South Central Alaska (1) found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. This proposal poses a threat to both the bear population and the local economy. 1 https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf).

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

An extended hunting season and bag limit may lead to potential conflicts with other user groups that also engage in activities within the area. It is unreasonable to assume that an extended hunting window will not attract a greater number of hunters to the area. Fishermen and other users can

accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Prior to extending the hunting season, it is essential for biologists to conduct a study to assess whether the bear population has genuinely recovered. At present, there are no baseline studies available regarding the population of bears in this region of the state. This proposal relies on anecdotal observations from individuals who stand to gain financially from its approval, rather than on robust scientific data. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. To have well known bears killed in front of wildlife viewer will give the state a black eye in the minds of both present and future wildlife viewers worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact on the state than the longer bear hunting season can be compensated for by hunter's dollars. A study published by the University of Alaska Fairbanks - The Economic Contributions of Bear Viewing in South Central Alaska (1) found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. This proposal poses a threat to both the bear population and the local economy. 1 https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf).

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

An extended hunting season may lead to potential conflicts with other user groups that also engage in activities within the area. It is unreasonable to assume that an extended hunting window will not attract a greater number of hunters to the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Prior to extending the hunting season, it is essential for biologists to conduct a study to assess whether the bear population has genuinely recovered. At present, there are no baseline studies available regarding the population of bears in this region of the state. This proposal relies on anecdotal observations from individuals who stand to gain financially from its approval, rather than on robust scientific data. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. To have well known bears killed in front of wildlife viewer will give the state a black eye in the minds of both present and future wildlife viewers worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact on the state than the longer bear hunting season can be compensated for by trophy hunter's dollars. A study published by the University of Alaska Fairbanks - The Economic Contributions of Bear Viewing in South Central Alaska (1) found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. This proposal poses a threat to both the bear

population and the local economy. 1 https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

A longer hunting season creates more dangerous conflicts with other user groups who also utilize the area. It is illogical to believe that a longer hunting window will not bring more hunters into the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Before the hunting season is lengthened, a study needs to take place by biologists who have no financial stake in the matter to determine if the bear population has in fact recovered. Currently, there is an absence of baseline studies on how many bears are in this part of the state. This proposal is based on anecdotal observations of individuals who will reap significant financial gain in it's passage rather than sound scientific data.

Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. To have well known bears killed in front of wildlife viewer will give the state a black eye in the minds of both present and future viewer worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact in the state than the longer bear hunting season can be compensated for by hunter's dollars. According to the Alaska Travel Industry's Alaska's 2022-2033 Visitor Profile report (1), 66% of the total visitors stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who hired guides, 30 % were sightseeing guides, 29 % were wildlife viewing guides, 17 % were fishing guides, and only 6% of guides that were hired were hunting guides. Clearly, Alaska cannot afford to alienate it's wildlife viewing visitors in order to satisfy 6% of it's total visitors. Extending the hunting season may overburden bear populations, which can't recover quickly due to their slow reproduction rate. According to the Katmai National Park researchers, 1/3 of brown bear cubs do not live to their first birthday. This proposal risks wiping out bears in these areas. 1 https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

A longer hunting season creates more dangerous conflicts with other user groups who also utilize the area. It is illogical to believe that a longer hunting window will not bring more hunters into the area. Fishermen and other users can accidentally be shot at or have a bear driven towards them by

a hunting party. Hunters who are occupying critical habitat where bears fish will reduce the survival of all of the animals who depend on the salmon to survive as well as damage the ecosystem that depends on the nutrients left behind in fish scraps and animal waste. Before the hunting season is lengthened, a study needs to take place by biologists who have no financial stake in the matter to determine if the bear population has in fact recovered. Currently, there is an absence of baseline studies on how many bears are in this part of the state. This proposal is based on anecdotal observations of individuals who will reap significant financial gain in it's passage rather than sound scientific data.

Much of the economy in game unit 9 is based on the tourism generated by bear viewing. The extended hunting window deprives other user groups of the ability to safely use the area and exclusively supports one user group at the expense of all others. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. To have well known bears killed in front of wildlife viewer will give the state a black eye in the minds of both present and future viewer worldwide and cause visitation to drop. The economic consequences will cause more of a negative impact in the state than the longer bear hunting season can be compensated for by hunter's dollars. According to the Alaska Travel Industry's Alaska's 2022-2033 Visitor Profile report (1), 66% of the total visitors stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who hired guides, 30 % were sightseeing guides, 29 % were wildlife viewing guides, 17 % were fishing guides, and only 6% of guides that were hired were hunting guides. A another study that was published by the University of Alaska Fairbanks - The Economic Contributions of Bear Viewing in South Central Alaska (2) found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. This proposal poses a threat to both the bear population and the local economy. Clearly, Alaska cannot afford to alienate it's wildlife viewing visitors in order to satisfy 6% of it's total visitors Extending the hunting season may overburden bear populations, which can't recover quickly due to their slow reproduction rate. According to the Katmai National Park researchers, 1/3 of brown bear cubs do not live to their first birthday. This proposal risks wiping out bears in these areas. 1 https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf 2 https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

Support Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

I support this proposal for all of the reasons in this proposal. The bear population within Katmai National Park is closely observed by by naturalists, rangers, park visitors and live camera viewers. It is widely recognized among this group that a considerable number of the regular bear population did not return to Brooks Falls this year. Bear viewing brings a tremendous amount of attention and revenue to the state. In this year's "Fat Bear Week" contest, over 1,041,124 votes were cast with between 80,000 – 100,000 people voting on a daily basis. Bear enthusiasts worldwide have recently become aware of the various proposals regarding the bears of Unit 9 and are actively seeking to educate themselves on these issues. The tourism industry in Alaska suffered greatly during the

Covid pandemic with many businesses being forced to permanently close.. While tourism is on the rebound, the state cannot afford to lose the economic advantages of the wildlife viewing public. According to the Alaska Travel Industry's Alaska's 2022-2033 Visitor Profile report (1) 66% of the total visitors to Alaska stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who hired guides, 30% were sightseeing guides, 29% were wildlife viewing guides, 17% were fishing guides, and only 6% of guides that were hired were hunting guides.

In a different study published by the University of Alaska Fairbanks - The Economic Contributions of Bear Viewing in South Central Alaska (2) found that wildlife viewing for Katmai National Park and Preserve contributed a yearly total of 84.6 million dollars to the Alaskan economy. The 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (2) reported that there were 640,000 total non-consumptive wildlife-viewing participants in the State of Alaska including both residents and non-residents. These wildlife-viewers spent a total of more than $2 Billion in 2011, with the average participant spending about $3,200. Clearly, Alaska cannot afford to alienate it's wildlife viewing visitors in order to appease 6% of its total visitor base. 1 https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf 2 (https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf)

Support Proposals 19 : Hunting Arctic fox on the Pribilof Islands

I support this proposal on the basis of the author's explanation of the problem. Arctic foxes are key to controlling small animal populations. Over hunting them could lead to a boom in rodents, which could upset the balance of the ecosystem and cause more problems for other animals as well as humans.

Support Proposals 20: Hunting Arctic fox on the Pribilof Islands

I support this proposal on the basis of the author's explanation of the problem. Arctic foxes are key to controlling small animal populations. Over hunting them could lead to a boom in rodents, which could upset the balance of the ecosystem and cause more problems for other animals as well as humans.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands which are home to a wide variety of fish and animal species. Over hunting them would result in the destruction of their habitats, which would have a negative impact on the ecosystem as a whole.

SUPPORT Proposal 22, Shorten wolverine hunting and trapping seasons

I support this proposal for the reasons given by the author. I believe the hunting season should coincide with the closure of trapping on February 28. This would give them the best chance at successful reproduction.

SUPPORT Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for the animals that depend on them.

SUPPORT Proposal 28: Reduce population and harvest objectives for moose in Unit 17B

I support this proposal for the reasons presented in this proposal.

SUPPORT Proposal 29: Review the population and harvest objectives for the Mulchatna caribou herd

In 2020, State biologists determined that the main reasons for the herd decline were disease, a lack of food as a result of climate change and past over grazing, as well as poaching. Changes in habitat and vegetation quality has likely reduced population potential since the last population objective was established. A new review should take this into consideration. A review of the population and harvest objective would provide valuable data to inform game management and provide directions for the Mulchatna Predator Control Program.

SUPPORT Proposal 30: Implement a three-year moratorium on caribou hunting in Units 17 and 19

I support this proposal for the reasons given in the proposal. The current population objective has been achieved only once. In 2020, state biologists determined that the main reasons for the decline were disease, a lack of food as a result of climate change and past over grazing, and poaching. The herd needs a resting period in order to help rebuild it's numbers. A moratorium should take place along with a review of the population and harvest objective to provide valuable data to inform game management decisions. More action needs to be taken to protect the herd beyond the Mulchatna Predator Control Program.

SUPPORT Proposal 31: Close the resident caribou season in Units 9B, 17 and 19

I support this proposal for the reasons given in the proposal. The current population objective has been achieved only once. In 2020, state biologists determined that the main reasons for the decline were disease, a lack of food as a result of climate change and past over grazing, and poaching. The herd needs a resting period in order to help rebuild it's numbers. A moratorium should take place along with a review of the population and harvest objective to provide valuable data to inform game

management decisions. More action needs to be taken to protect the herd beyond the Mulchatna Predator Control Program.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This proposal would only encourage over harvesting of bears in the area. Defense of Life and Property is still an option in the off season and the reporting process provides a guard rail to prevent over harvesting. ADFG recommends that hunting should be avoided while a predator control program is in place, which it is.

OPPOSE Proposal 33: Allow airborne hunting of bears and wolves

Hunting animals from aircraft is both inequitable and unethical. It disrupts wildlife and may result in population declines that adversely affect the entire ecosystem. Bears reproduce infrequently, approximately every 4 to 6 years, and one-third of cubs fail to survive their first year, thus over hunting could rapidly diminish the population. This proposal is based on anecdotal theories of individuals rather than sound scientific data. ADFG states that hunting should be avoided while a predator control program is in place, which it is. Since harvest objectives are being met, there is no reason to adopt extreme hunting techniques.

Wildlife viewers from around the world are following the Greater Mulchatana Predator Control Area predator removal program as well of many of the proposals that are currently under review and are educating themselves about these matters. The tourism industry in Alaska suffered greatly during the Covid pandemic with many businesses being forced to shut down for good. While tourism is on the rebound, the state cannot afford to lose the economic benefit of the wildlife viewing public. According to the Alaska Travel Industry's Alaska's 2022-2033 Visitor Profile report (1), 66% of the total visitors stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who hire guides, 30% were sightseeing guides, 29% were wildlife viewing guides, 17% were fishing guides, and only 6% of guides that were hired were hunting guides. A little over 20 years ago, the state was forced to back away from a wolf control program due to public outcry and threatened boycotts of the Alaska Tourism industry. With the commonplace use of social media, I believe that allowing airborne hunting in a region that is already conducting a controversial predator control program has the potential to trigger an economic catastrophe for the small businesses that depend on tourism dollars. According to the 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (2) there were 640,000 total non-consumptive wildlife-viewing participants in the State of Alaska including both residents and non-residents. It was reported that these wildlife-viewers spent a total of more than $2 Billion in 2011, with the average participant spending about $3,200. 1 https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf 2 https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf

OPPOSE Proposal 34: Allow the same day airborne take of brown bear in Unit 17

Hunting animals from aircraft is both inequitable and unethical. It disrupts wildlife and may result in population declines that adversely affect the entire ecosystem. Bears reproduce infrequently, approximately every 4 to 6 years, and one-third of cubs fail to survive their first year, thus over hunting could rapidly diminish the population. This proposal is based on anecdotal theories of individuals rather than sound scientific data. ADFG states that hunting should be avoided while a predator control program is in place, which it is. Since harvest objectives are being met, there is no reason to adopt extreme hunting techniques.

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SUPPORT Proposal 35: Shorten the trapping seasons for wolverine in Units 9 and 17

I support this proposal for the reasons given by the author of this proposal. The current hunting season for wolverine in Unit 17 extends into the denning period. When denning females with young are killed, this causes a population decline. Shortening the hunting season would give them the best chance at reproduction.

SUPPORT Proposal 36: Shorten the hunting season for wolverine in Unit 17 :

I support this proposal for the reasons given by the author of this proposal. The current hunting season for wolverine in Unit 17 extends into the denning period. When denning females with young

are killed, this causes a population decline. Shortening the hunting season would give them the best chance at reproduction.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Hunters in 13 have the opportunity to choose between a spring or fall hunt. Should they wish to participate in both hunting seasons, there are ample opportunities to harvest a second bear in neighboring game management units There is no data to support the hypothesis that the additional killing of brown bears in this area will increase the moose population. In the most comprehensive predator control report to date, Efficacy of Killing Large Carnivores to Enhance Moose Harvests: New Insights from a Long-Term View by Sterling D. Miller, David K. Person , and Terry Bowyer (1) the report states that no link was found between predator control programs and the increase in moose populations. "Regardless of how we sorted the available data we were unable to detect a positive relationship between kill numbers of any predator species and subsequent moose harvests. Neither did we find significant increases in mean moose harvests during two periods of official wolf predator control and a prior period. The long period encompassed by our analyses calls into question conclusions from shorter-term studies indicating that predator control in GMU 13 resulted in increased moose harvests (e.g., [34]). In short-term studies, there is a danger of accepting an apparent fit of observations to a preferred explanation. Our analyses demonstrate that a focus only on increased killing of predators to enhance harvests of moose can be a poor paradigm for management of moose in GMU 13 (and likely other areas). The 1997 National Research Council report evaluating predator control in Alaska concluded that, in part, many predator-control experiments had been insufficiently monitored, and that design of those experiments did not allow firm conclusions regarding the causes of subsequent changes in ungulate populations [20]. The Council also recommended that wolves, bears, and ungulates be managed with an adaptive-management approach [49]. " 1 https://www.mdpi.com/1424-2818/14/11/939

OPPOSE Proposals 58: Reduce the minimum wolf population in the Unit 13 Intensive Management Plan for wolves

Wolf control programs have not been successful for boosting caribou numbers in other parts of the state. A wolf control program had been going on for 12 years in the Mulchatna Caribou Herd Predation Management Area, but the caribou population continued to drop. It would be prudent to first collect and examine data to determine if the hunting closure of the Nelchina caribou herd has had a positive impact on the population before a further reduction of the wolf population takes place.

OPPOSE Proposals 59 Lengthen the wolf trapping season in Unit 11

Wolves are still shedding out their coats at the beginning of August and have not grown into their winter coats. A wolf in this condition would provide little economic value.

SUPPORT Proposal 61: Change the start date for the ptarmigan hunting season in Unit 13B

I believe that the ptarmigan hunting season should coincide with the time when the juvenile birds have sufficiently grown enough to be usable for human consumption, as stated in the proposal.

OPPOSE Proposals 70 Extend the hunting season for brown bear in Units 14A and 14B

Baiting bears leads them to associate humans with a readily available food source, increasing the likelihood of dangerous encounters with people. The suggested extension of the bear hunting season coincides with the peak period when other recreational user groups are most likely to be present in the back country. Maintaining the bear season within its established time frame will reduce the likelihood of dangerous encounters with other recreationists who may inadvertently enter a bear baiting area. The National Weather Service reports that South Central Alaska is expected to experience below normal precipitation during the winter of 24-25. As a result, the snow pack is likely to diminish earlier this season compared to recent years, potentially leading to brown bears emerging from their dens sooner.

OPPOSE Proposals 71 Extend the brown bear hunting season in Unit 14B

Baiting bears leads them to associate humans with a readily available food source, increasing the likelihood of dangerous encounters with people. The suggested extension of the bear hunting season coincides with the peak period when other recreational user groups are most likely to be present in the back country. Maintaining the bear season within its established time frame will reduce the likelihood of dangerous encounters with other recreationists who may inadvertently enter a bear baiting area. The National Weather Service reports that South Central Alaska is expected to experience below normal precipitation during the winter of 24-25. As a result, the snow pack is likely to diminish earlier this season compared to recent years, potentially leading to brown bears emerging from their dens sooner.

There is no data to support the hypothesis that the additional killing of brown bears in this area will increase the moose population. In the most comprehensive predator control report to date, Efficacy of Killing Large Carnivores to Enhance Moose Harvests: New Insights from a Long-Term View by Sterling D. Miller, David K. Person, and Terry Bowyer (1) the report states that no link was found between predator control programs and the increase in moose populations “Regardless of how we sorted the available data we were unable to detect a positive relationship between kill numbers of any predator species and subsequent moose harvests.” 1 https://www.mdpi.com/1424-2818/14/11/939

OPPOSE Proposals 75 Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan

I oppose proposal 75 for the following reasons: Unit 16 is located between Denali National Park, Denali National Preserve, Denali State Park, Lake Clark National Preserve, and Lake Clark National Park. These parks are used by both Alaskans and visiting recreationists and wildlife enthusiasts from around the world. According to the Alaska Travel Industry's Alaska's 2022-2033 Visitor Profile report (1) , 66% of the total visitors to Alaska stated that wildlife viewing was one of their primary activities, 30% identified bear viewing as a primary activity while only 6% listed hunting as a primary activity. Of those visitors who hire guides, 30% were sightseeing guides, 29% were wildlife viewing guides, 17 % were fishing guides, and only 6% of the guides that were hired were hunting guides. Wildlife viewers from around the world are following the Greater Mulchatana Predator Control Area predator removal program as well of many of the proposals that are currently under review, including this one and are educating themselves about these matters. The tourism sector in Alaska experienced significant decline during the Covid pandemic, resulting in the permanent closure of numerous businesses. Although tourism is recovering, the state cannot forfeit the economic advantages provided by wildlife viewing enthusiasts. Approximately twenty years ago, the state was compelled to back away from a wolf control program in response to public dissent and impending boycotts of the Alaska tourism sector. With the commonplace use of social media, I believe that if a predator control program such as this one was enacted, it could potentially trigger an economic catastrophe for small businesses that depend on tourism dollars.

According to the 2011 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (2), there were in total 640,000 non-consumptive wildlife-viewing participants in the State of Alaska including both residents and non-residents. It is reported that these wildlife-viewers spent a total of more than $2 Billion dollars in Alaska in 2011, with the average participant spending about $3,200. Alaskan businesses cannot afford to lose this source of income.

There is no data to support the hypothesis that the additional killing of brown bears in this area will increase the moose population. In the most comprehensive predator control report to date, Efficacy of Killing Large Carnivores to Enhance Moose Harvests: New Insights from a Long-Term View by Sterling D. Miller, David K. Person, and Terry Bowyer (3) states that no link was found between predator control programs and the increase in moose populations “Regardless of how we sorted the available data we were unable to detect a positive relationship between kill numbers of any predator species and subsequent moose harvests. Neither did we find significant increases in mean moose harvests during two periods of official wolf predator control and a prior period. The long period encompassed by our analyses calls into question conclusions from shorter-term studies indicating that predator control in GMU 13 resulted in increased moose harvests (e.g., [34]). In short-term studies, there is a danger of accepting an apparent fit of observations to a preferred explanation [48].

Our analyses demonstrate that a focus only on increased killing of predators to enhance harvests of moose can be a poor paradigm for management of moose in GMU 13 (and likely other areas). The 1997 National Research Council report evaluating predator control in Alaska concluded that, in part, many predator-control experiments had been insufficiently monitored, and that design of those experiments did not allow firm conclusions regarding the causes of subsequent changes in ungulate populations [20]. The Council also recommended that wolves, bears, and ungulates be managed with an adaptive-management approach [49]. Those previously identified shortcomings

in research design and implementation remain for most predator-reduction efforts conducted in Alaska prior to and after passage of the Intensive Management Statute."

The Operational Plan for Intensive Management of Moose in Game Management Unit 16 During Regulatory 2015–2017 plan prepared by the Division of Wildlife Conservation (4)) states that "A spatial analysis was also conducted that showed no relationship between bear harvest locations and calf survival within the Tyonek study area."

1 https://www.alaskatia.org/sites/default/files/2023-12/ATIA%20Alaska%20Visitor%20Profile%202022-2023.pdf 2 https://inletkeeper.org/wp-content/uploads/2024/04/Bear-Viewing-Economics-Study.pdf 3 https://www.mdpi.com/1424-2818/14/11/939 4 https://www.adfg.alaska.gov/static/research/programs/intensivemanagement/pdfs/2015_gmu_16_intensive_management_operational_plan.pdf

OPPOSE Proposals 76 Allow the take of brown bear in Unit 16, the same day airborne

The current law allows hunters to take two brown bears in unit 16 with no closed season in most of the unit. This is more than sufficient to provide the opportunity to harvest bears. Same day aerial hunting gives hunters an unfair advantage and goes against the fair chase/sporting ideology that hunting is based on. Giving hunters the ability to monitor an area with aircraft in real time will will obliterate any remnants of the fair chase principle. Bears reproduce slowly, typically every 4 to 6 years and 1/3 of cubs do not survive their first year of life, so over hunting could rapidly decimate the population before action can taken.

OPPOSE Proposals 77 Extend the brown bear season in Unit 14B

The current weather patterns are no longer influenced by El Niño. According to the National Weather Service, South Central Alaska will have below normal precipitation for the winter of 24-25, therefore the snow pack will disappear sooner this season than in other recent years and bears should return to their prior times for leaving their winter hibernation. Baiting bears with food teaches them to associate humans as a source of an easy meal which makes them more likely to get into dangerous conflicts with people. The proposed time block to lengthen the bear hunting season falls during the the time period that other recreational user groups are most likely to be in the back county. Keeping the bear season at its current time frame will lessen the chance of a deadly encounter occurring to other recreationists who unknowingly stumble into a bear baiting area.

There is no data to support the hypothesis that the additional killing of brown bears in this area will increase the moose population. In the most comprehensive predator control report to date, Efficacy of Killing Large Carnivores to Enhance Moose Harvests: New Insights from a Long-Term View by Sterling D. Miller, David K. Person, and Terry Bowyer (1) states that no link was found between predator control programs and the increase in moose populations "Regardless of how we sorted the available data we were unable to detect a positive relationship between kill numbers of

any predator species and subsequent moose harvests." 1https://www.mdpi.com/1424-2818/14/11/939

OPPOSE Proposals 78 Allow the same day airborne take of wolves in the active, Unit 16 Intensive Management Plan

This proposal would only encourage the rapid over harvesting of wolves in the area. ADFG states that hunting should be avoided while a predator control program is in place, which it is. Restricting same day airborne to ADFG staff and approved pilots will enhance oversight and accountability .

OPPOSE Proposals 79 Extend the wolf trapping season in Unit 14A

The snow pack is often too rotten in the month of May for safe travel. With the sudden weather changes, traps may be become inaccessible and unable to be checked.

SUPPORT Proposals 80: Require sealing of beaver taken in Unit 16:

I support this proposal for the reasons given in the proposal. Implementing this proposal will help to gather data on a declining population which will help to guide any future actions.

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SUPPORT Proposal 81 Require traps and snares set within two miles of publicly maintained roads in Unit 14A be checked at least every 36 hours

I support this proposal for all of the reasons listed in this proposal. Traps that are near publicly maintained roads are easily accessible to their owners and will not cause an undue hardship to them by frequent monitoring. Traps that are set near roadways are more likely to catch domesticated animals than those that are in the back country. The frequent checking of traps can help to mitigate future conflicts.

SUPPORT AS AMENDED Proposals 82: Establish 50-yard trapping setbacks along specific trails in Unit 14

I support this Proposal with an Amendment to add the following trail systems to the list:

West Gateway trail system in Unit 14A, See attached Map

Crevasse-Moraine trail system in Unit 14A

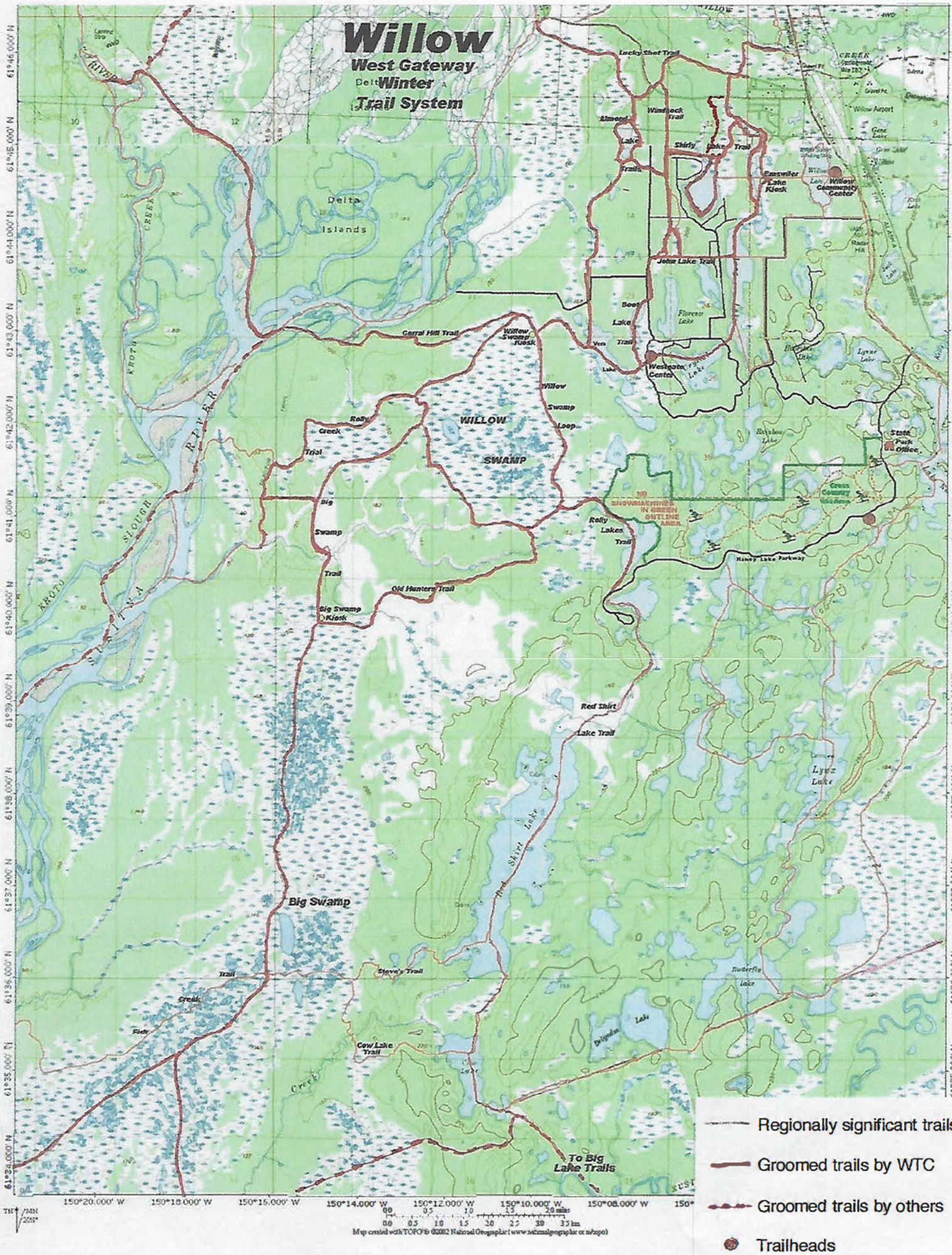
I believe that this proposal is a pragmatic solution that would help to resolve a decades long conflict between user groups. The trails that are listed within this amended proposal are the most heavily trafficked trails in the Matanuska -Susitna Valley by numerous user groups. I have observed that in the past, discussions of trapping setbacks was boiled down to the theory that user conflicts

are simply a loose dog problem. Trail users venture off of the main trail for a number of reasons such as avoiding moose in the trail; collecting berries, mushrooms and antlers; bathroom breaks; walking around downed trees or muddy areas; etc.. Setbacks keep trail users safe and still give access to the area by trappers. The way the current law is written, trappers can legally place traps anywhere near a trail or even on a multi use trail. In the Wasilla area, a neighbor of mine almost stepped in a leg hold trap that was placed in the middle of a trail. Luckily for her, her husband was a trapper so she noticed indicators of a nearby trap. The vast majority of the trail using public does not have her knowledge base and most likely would have been injured. While dog mushing on a groomed trail in the West Gateway trail system, a friend of mine reported that he once had to walk ahead of his team in order to move snares that were overhanging the trail. His dogs were tethered and did not leave the hard packed groomed trail yet they nearly became victims. By creating trapping setbacks and making these trails known to the public, trail users would know which trail systems were “safe” and this knowledge would draw users to them. The usage on the no set back trails would potentially go down and this would lesson potential conflicts on the trails that have no setbacks.

I have amended the proposal for the following reasons:

The West Gateway trail system in Willow is heavily used year round by various user groups who travel to the Willow area from all over South Central Alaska to recreate there. Many Alaskans own second homes and cabins in the community. Both private users as well as a number of commercial guiding companies use these trails on a daily basis. The West Gateway trail system is the most heavily used trail system in the Willow area. This trail system is groomed and maintained by the Willow Trail Committee. The Willow Trail Committee sponsors an annual “Willow Trails Challenge” where trail users can win prizes by visiting all of the trails in the trail system. These events takes place in both the winter and summer months to encourage the use of the trails that are seasonally available. Within Willow, there are four different trail systems: The West Gateway trail system, the Haessler-Norris trail system, the Emil Stancec trail system, and the Nancy Lake Recreation Area. This means that local trappers would have several close by trail options that would have no setbacks and this amended proposal would not cause any hardship to them. The boundaries for the proposed trail system setbacks would be the Parks Highway to the east, Willow Creek to the north, the Susitna River to the west and the Nancy Lake State Recreation area to the south. The Old Hunter's trail would be the farthest trail to the south to be included in this amended proposal.

I amended the proposal to include the Crevasse-Moraine Trail System because it is a heavily used trail system that is interconnected with the Matanuska Lakes State Recreation Area developed trails that are already listed in the Proposal



Submitted by: Heather Moore

PC202

PC203

Name: Caitlin Moore

Community of Residence: Seattle, WA

Comment:

- I oppose Proposal 75. We must protect wolf and bear populations. Decades of predator control have failed to show scientific or practical benefits for prey populations. Additionally, predator control programs prioritize hunting over safe wildlife viewing. This undermines Alaska's reputation and economic benefits from tourism while also harming wildlife populations.

- I support Proposal 11. The brown bear hunting season near Katmai should not overlap with bear viewing season.

PC204

Name: Lenora Morford

Community of Residence: Chuhgiak

Comment:

I OPPOSE PROP 75. Wasting even more money killing in Unit 16 is NOT SCIENCE BASED and interferes with the tourist industry. Those bears are slow to reproduce and far more valuable alive. I have worked with the tourists, and they always want to see bears.

I SUPPORT Prop 29. You have killed too many bears already pretending you understand the system. STOP!

I OPPOSE Prop 2. Leave those bears alone. You are just doing the wrong thing!

PC205

Name: Kevin Morford

Community of Residence: Chugiak

Comment:

I am writing to oppose your proposal number 75, and to support your proposal number 29. There is no good science to support predator control as an effective way to restore moose and caribou populations. Killing more bears and wolves is hugely wasteful and there is no good evidence that it will boost moose and caribou populations. Do the studies first, such as the one called for in your proposal number 29. Science first.

A Written Response to the Recent ADGF Proposals - 12-9-24

Joan Mullally, "Citizen Scientist," and conservationist"

I am writing in reference to the recent proposals made by ADFG. These proposals, for the most part, make no sense economically long-term, and are unsustainable even short-term.

Alaska is one of the last great wildernesses in the US, and many people would love to go see the wildlife, not shoot it. Encouraging 'trophy hunters' to come to the region to 'spend money at local businesses' might help the state in the short-term, but what happens when all of the animals are dead? Who is going to want to visit then? NO ONE.

I will go through the proposals in numerical order and try to help you to understand the devastation most of these proposals would cause.

OPPOSE Proposal 1

Reauthorize the brown bear tag fee exemptions for the Central and Southwest Region Units

Eliminating tag fees REDUCES funding for wildlife management programs critical for all species in these regions. Without proper funding, the ecosystem, including brown bears, may suffer due to overharvesting and inadequate conservation efforts. You claim in some of the other proposals you are suggesting them in order to bring more money into the region from trophy hunters (9, 13-17) and yet here you're saying to let these people hunt for free? It makes no sense. It sounds more like extermination than hunting.

It's also the height of foolishness, because bears are an indicator species in any ecosystem where they live.

In addition, a bear's reproductive cycle is a minimum of four years between mating in Year A, giving birth in Year B, (Spring cubs or cubs of the year), the cub maturing in year C (a yearling), and surviving to independence in year D (2.5 years old, emancipated subadult). 33% of cubs do NOT make it to year D.

If there are optimal food conditions and she is fat enough, then she gets pregnant, that is, the fertilized egg implants. But there is no guarantee of this.

2023 was a terrible salmon year, resulting in only 7 cubs in the Brooks Falls area, for instance, and one was killed by a male bear. Many females did NOT go into estrus in 2024 because they were so nutritionally deprived the previous year.

So we have sows with no cubs, or non-emancipated ones, in years E and F as well. As long as they are not in estrus / still have cubs from their most recent litter, they will not mate, and there will be no cubs.

The amount of hunting you are suggesting permitting would not allow the bear population to rebound, and there would soon be no bears for hunting, or for delighted tourist who love seeing nature in the wild.

Animals like sheep and caribou can have a calf every year. If bears can only have one from every 4 to 6 years, we can see why bears need to be protected, and caribou don't, purely in terms of numbers and logic.

OPPOSE Proposal 2

Open two bear baiting seasons in Units 9, 11, 13, 14B, 14C, 16, and 17 where bear baiting is legal

Bear baiting disrupts the natural foraging behaviors of brown bears, habituating them to human food and increasing conflicts with people. This practice also harms other wildlife in the area by introducing unnatural food sources, destabilizing ecosystems.

Of course a bear is going to go for bait. They are hungry and trying to survive, especially when they are in their hyperphagic state and eating non-stop in order to fatten up for winter. Murdering a bear just because they are trying to survive is grotesque. It also harms the ecosystem, and closer contact with humans can lead to other forms of conflict. A wild bear should be allowed to be wild. They are NOT a pet. They do NOT want to engage with humans at all if they can help it. But they are naturally curious, and almost always very hungry.

Autumn, as we have mentioned, and spring, when they come out of hibernation after almost 6 months of not eating.

Either time of year is a disaster for the species. Sows with cubs, killing her is a death sentence for them as well. Males, out of the gene pool forever once they are dead. Kill them in fall, again, the cubs will be affected. They spend all year trying to care for their cubs and raise them successfully (up to 33% never make it to adulthood) and you want to lower these odds even more?

This isn't "management," it's murder.

OPPOSE Proposal 3

Allow the use of cellular cameras for taking black bear and brown bear over bait in Unit 9, 11, 13, 14B, 16, and 17

Using cellular cameras makes hunting black and brown bears excessively efficient, increasing the risk of overharvesting. These devices also disturb other wildlife through constant monitoring and human activity, causing ecosystem imbalances.

If you want to hunt, fine, don't use any tech to do it. Bows and arrow. Then let's see how brave all these 'trophy hunters' are.

And why would anyone want to hunt an animal they can't eat? What, skin, head, paws, and the rest is left to rot? Disgraceful.

OPPOSE Proposal 4

Establish general season, archery-only sheep hunts in Units 9, 11, 13, 14A, and 14B

Sheep are a critical part of alpine ecosystems, and increased hunting pressure could reduce their populations. This would force predators, including bears, to search for food in other areas, leading to more human-wildlife conflicts and ecosystem disruption.

It's a balance of nature that we ignore at our own peril. There are NO long term studies of the impact of overhunting. Sheep can drop lambs every year. The soonest any bear could reproduce would be on a 4 year cycle , sometimes up to 6 years, once they reach sexual maturity at about age 5 or 6. The bears need to take precedence simply on the basis of facts, numbers, and logic.

If you have too many sheep, well, let the bears eat them!

OPPOSE Proposal 5

Reduce the nonresident bag limit for caribou in Unit 9D from two bull caribou to one

While this reduces pressure on caribou, it may unintentionally shift hunting focus to other species like moose or bears, disrupting predator-prey dynamics and destabilizing ecosystems.

It will also put stress on grassland essential to survival Bears need new healthy grasses after hibernation, until other foods are available, including salmon. They also help clear out the digestive track post-hibernation. For spring cubs, it's usually their first solid food, and a good source of protein.

I don't approve of hunting in any form, but if you're going to pick and choose who to protect, caribou can have a calf every year, bears only ever 4 to 6 years. On the basis of fact alone, the bear need to be protected, not starved, or hunted, to the point of extinction.

OPPOSE Proposal 6

Shorten the nonresident hunting season for caribou in Unit 9D

Shortening the caribou season could redirect hunting pressure onto other species, potentially increasing stress on bears and impacting the balance of the ecosystem.

Why allow nonresidents in the first place? You want 'trophy hunters' to come and spend money in the local economy, sure, but how many of them are going to fly back to Washington, DC with their kill in their carry-on luggage?

Rotting carcasses littering the place is not very healthy, but of course, bears help keep the forest clean.

OPPOSE Proposal 7

Extend the fall Southern Alaska Peninsula caribou season for residents and nonresidents

Extending caribou hunting season prolongs human activity in critical habitats, affecting not just caribou but also the predators, like bears, that depend on them. This disturbance can ripple through the ecosystem, harming all wildlife.

You want to cut down the number killed on the one hand extend the dates of the hunting season on the other? You can't have it both ways.

Again, the desire for tourist revenue is determining this proposal, not logic or common sense.

But how about we let everyone come and shoot the animals with CAMERAS instead. Encourage eco-tourism. Alaskan safaris, as they do with the polar bears in Churchill, or on the African plains.

Your hunting policies would lead to animal extinction for some species in maybe a decade, then you will have ZERO tourist dollars.

OPPOSE Proposal 8

Clarify that hunting feral reindeer in Unit 10, Umnak Island, is allowed under current caribou hunting regulations

Hunting feral reindeer may unintentionally affect native species, as increased human activity can disturb brown bears and other predators in the area, impacting the natural ecosystem balance.

The reindeer are contained on an island--let them do their thing, as nature intended.

OPPOSE Proposals 9, 13–17

Various changes to brown bear hunting seasons in Unit 9 and 14

Any bear hunting is NOT a good thing given the huge benefits they offer their environment.

Lengthening bear hunting seasons risks overharvesting a keystone predator. Brown bears regulate prey populations and maintain ecological health, so their loss can disrupt food webs and lead to cascading effects on other species.

Humans would be the first to scream about being overrun by rats, mice, voles, and other small mammals, key food sources for bears. Again, you can't alter one thing in nature without it having a domino effect, and because of the last of studies and statistic, you have no clue what that effect will be.

It's better to keep things as they are in terms of slaughtering animals, and in particular, keystone species like bears, or apex predators like wolves.

Farmers may complain they are losing livestock, but again, most wild animals with their own land and food sources would not go anywhere near human by choice. You keep taking their land and food, what choice are you giving them? Then you want to murder them just for trying to survive.

And what, it's okay for a human to hunt a sheep and kill it, but NOT okay for a bear? Bears do not heave supermarkets and DoorDash.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Good, but no hunting would be even better. Once again, you are inviting overhunting in a population that would not be able to bounce back easily.

OPPOSE Proposal 11: Shorten the spring and fall brown bear hunting seasons in Unit 9C by one week for residents and nonresidents

Good, but no hunting when they are getting ready to den for hibernation would be even better. How many orphaned spring cubs would you create, who would die that winter on their own? Bear populations can't sustain those kind of losses. The 11% increase in the number of sows killed in the last years is proof of that.

OPPOSE Proposal 12: Lengthen the fall brown bear hunting seasons in Units 9D and 9E for both residents and nonresidents

NO. For the same reason. Overharvesting, and a 4 to 6 year 'cycle' for a sow to raise a cub to adulthood bears means genocide sooner or later.

Support with Amendment Proposal 18

Shorten the spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permit hunts

Shortening hunting seasons for brown bears is a positive step, helping stabilize their populations and ensuring they continue to fulfill their ecological role, which benefits other species in the region.

Shorten is good, END is better.

Just end the hunting seasons. Bears can only produce offspring ever 4 to 6 years. Allowing hunting to continue long term is like genocide at that point.

Support with Amendment Proposals 19–20

Establish hunting and trapping bag limits for Arctic fox on the Pribilof Islands in Unit 10

Arctic foxes play a key role in controlling small mammal populations. Overharvesting them could lead to prey population booms, which would likely cause humans even more disruption with mice, voles etc. than the Arctic fox.

Again, where are your studies, facts and figures to support hunting there at all? You tamper with the balance of nature at your own peril. And since it is an island, it is a closed ecosystem that will sort itself out.

OPPOSE Proposal 21

Remove the two-per-day bag limit for beaver during April 15–May 31 in Unit 9

Beavers create wetlands that support biodiversity. Overharvesting them would degrade these habitats, affecting all species that rely on them.

-

OPPOSE Proposals 22, 35–36

Shorten the wolverine hunting and trapping seasons in Units 9 and 17

Wolverines are important scavengers that help maintain clean ecosystems. Protecting them benefits not only wolverines but also predators like bears, which rely on healthy ecosystems for survival.

This is absurd. Bears enrich the environment they are in, wolverines don't. Again, I don't approve of hunting and trapping anything, but once again, you are overlooking the importance of bears in the ecosystem in favor of one who is far less important. They have 2 to 4 kits every single year, and yes, they scavenge, traveling further and further afield to eat. IF they do, others do not. There are only limited natural resources and higher levels would not be sustainable long-term.

OPPOSE Proposal 23

Lengthen the nonresident hunting season for Emperor geese and increase permits

Emperor geese are vital to the coastal ecosystem. Increased hunting pressure could reduce their population, affecting scavengers and predators, including bears, that rely on these coastal food sources.

OPPOSE Proposal 24

Close the season for Alaska hares in Units 9 and 17

Alaska hares are an important prey species. Protecting them ensures a balanced food web, indirectly benefiting predators like bears and maintaining overall ecosystem health.

However, if you are so intent on killing bears and wolves, you will soon find yourself overrun. They can give birth to TWO litters a year of 2 to 8 leverets.

Again, you need to keep numbers in balance. You can't kill as many bears, wolves and Arctic foxes as you like and not expect an explosion of the small mammal populations.

OPPOSE Proposals 25–27

Various changes to moose hunting in Unit 17A

Moose are a key food source for bears, if they can get hold of a young one. Increasing moose hunting reduces this resource, forcing bears to seek alternative food sources, and risking greater human-wildlife conflicts.

OPPOSE Proposals 28, 30, 31

Caribou population and hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps maintain healthy populations, indirectly benefiting predators like wolves and bears that rely on them, while preserving the balance of the broader ecosystem.

However, if you're so intent on killing bears, the balance will be lost and there will be consequences to land use and food sources.

Support with Amendment Proposal 29

OPPOSE Proposal 32

Allow year-round take of brown bear in Unit 17

Year-round hunting of brown bears disrupts their life cycles, leading to population declines. This would negatively impact the ecosystem, as bears play a crucial role in regulating prey species and nutrient cycling.

They can only have one litter l of one to 4 cubs (rare, and no litter has ever had all 4 survive at Brooks Falls) once every 4 to 6 years. Year-round killing would mean sows would be killed, and their cubs orphaned.

You want to bring in money from tourists? Stop the slaughter and hold Alaskan wildlife safaris. Shoot with cameras, not guns.

OPPOSE Proposals 33 and 34

33

Unlawful methods for taking big game. Allow same day airborne take of brown bear and wolves Unit 17.

34

Unlawful methods for taking big game. Allow the same day airborne take of brown bear in Unit 17.

You are allowing people to literally fly in and out to kill animals for 'sport'? And what about the wonderful profits you claim these people will bring local businesses in the area?

Why are brown bear being targeted so ruthlessly? They can't reproduce fast enough to sustain these losses.

And certainly not if you're allowing "hunting" from helicopters. A real hunter wants to bag a trophy, that is one thing. Gunning them down, mothers and their cubs, is unspeakable.

OPPOSE Proposals 37–38

Changes to beaver hunting and access to Walrus Island State Game Sanctuary

Expanding beaver hunting or sanctuary access increases habitat degradation. Reduced wetlands from overharvested beavers impact many species, including bears, that rely on these habitats.

Do you not understand the meaning of the word sanctuary? A place of refuge or safety, or a nature reserve. It is NOT a place for killers to be allowed to murder the animals that are supposed to be protected.

Plus, you only cite beaver. You 'allow access', there is nothing to stop these armed and dangerous people from doing whatever they like, killing whatever they way.

Walrus Island State Game Sanctuary
https://www.adfg.alaska.gov/index.cfm?adfg=viewinglocations.walrusislands#:~:text=Each%20spring%2C%202%2C000%20to%2010%2C000,play%20on%20the%20island%20slopes. Let tourists have access, birdwatchers, but all means, but not hunters.

OPPOSE Proposals 39–45

Various changes to moose hunting in Unit 13

Increasing moose hunting reduces available scavenging resources for predators, including bears. This impacts their health and behavior, leading to broader ecosystem instability.

OPPOSE Proposals 46–50

Various changes to caribou and sheep hunting in Units 11 and 13

Caribou and sheep are key prey species. Overhunting disrupts predator-prey dynamics, forcing predators like bears to seek alternative, often less sustainable, food sources.

Again, you are encouraging hunting of one, preservation of another, and have it all backwards because bear numbers will never be sustainable compare to sheep and caribou, who can have offspring every year, not every 4 to 6 years.

OPPOSE Proposals 51 to 56

Hunting sheep and goats. Seriously? When there are hungry bears and other animals out there?

You steal their habit, destroy their food supply, have fits about human-bear conflict if they are desperate enough to come too close to people because they need to eat. You are literally murdering bears and wolves for no other reason than being hungry and trying to survive, when it is clear from this that there is PLENTY of food. Let THEM kill it naturally, not have people blast away with their weapons and then just leave carcasses and mess behind. Then begrudge the bears even the scraps! It is despicable.

OPPOSE Proposal 57

Increase the bag limit for brown bears in Unit 13

Raising the bag limit for brown bears risks overharvesting, destabilizing ecosystems where they regulate prey populations and contribute to nutrient cycling.

Bears can only ever have a litter every 4 to 6 years. A couple of seasons of overhunting will cause untold damage, especially if sows are killed, a death sentence for the cubs too.

You need to look at long-term sustainability, not short term profits catering to those who want to lure hunters to the region so they will spend money in the area.

Ecotourists on an Alaskan safari would spend more, and come back year after year, because the animals would still be alive to see, not dead and gone.

OPPOSE Proposals 58–59

Changes to wolf population management in Unit 13

Reducing wolves disrupts predator balance. Small mammals overrunning the area would be a disaster for humans for sure, and other animals competing for resources. Small mammals can have at least one letter a year. They can procreate and reproduce far faster than a wolf or bear.

OPPOSE Proposals 60–63

Changes to trapping and hunting for ptarmigan in Units 13 and 14

Ptarmigan are a food source for predators. Overhunting them reduces prey availability, indirectly impacting bears and other predators that rely on a healthy ecosystem.

OPPOSE Proposals 64, 66, 67,

All of these proposals regarding moose hunting cater to the vested interests of hunters, not the well-being of the species. Once they are out there blasting away, how do you think you're going to regulate their behavior? Overhunting can lead to imbalance. Yes, they have a calf every year, but where are your numbers, statistics, impact studies for the region?

And again, bears and wolves could help keep down the population naturally if you weren't so intent on slaughtering them, even from helicopters.

Support with Amendment 65, 68, 69

OPPOSE Proposals 70–84

Changes to hunting seasons and trapping requirements in Units 14 and 16

Expanding hunting and trapping seasons increases disturbance to ecosystems, harming species like bears that rely on stable habitats and food availability.

You can't keep stealing their habitat, eliminating their food sources, AND hunt them, without there being a serious impact on the region.

If populations of moose, goat, sheep and caribou need to be kept under control, I'm sure the bears would be happy to do it. If this is all about trophies and tourism dollars from the hunters, cater to tourists who won't slaughter your MAIN attraction for people wanting to visit Alaska. They're not coming for the culture and fine dining, are they? They are coming for the rugged, unspoiled wilderness. And above all, to see native Alaskan animals doing what they normally do, get food, raise cubs, and so on. No different from a human, right?

Concluding Remarks

The level of hunting of particular species, especially the brown bear, is not sustainable long-term. Ecotourism is. Every year at Brooks Falls, more and more people go to visit to see live bears in their natural habitat. The same is true of many of the parks in Alaska, the last great wilderness in the US. Take them on photo safaris, the tourists will come back year after year. TRophy hunters? They have no reason to come back when they've slaughtered so many it isn't 'sport' any more.

In conclusion, almost all of these proposals threaten to destabilize Alaska's ecosystems by overharvesting key species, disrupting predator-prey dynamics, and increasing human interference in wildlife habitats.

Overhunting of caribou, moose, bears, and smaller species like beavers and ptarmigan reduces food sources and habitat quality for predators and scavengers, including brown bears, while expanding hunting seasons and methods like bear baiting or airborne takes exacerbate stress on wildlife populations.

If animals DO have to be hunted, do NOT favor a species that can procreate every single year, compared to a species that can only procreate every 4 to 6 years.

Keystone species like bears play critical roles in maintaining ecological balance, and these proposals risk their survival by undermining conservation efforts, creating cascading effects throughout the ecosystem. Sustainable wildlife management prioritizes balance, and these measures tip the scales toward overexploitation.

Thank you for your understanding of these critical issues.

Joan Mullally
[redacted]
Brooklyn, NY 11209
United States

"Citizen scientist" for the Brooks Falls brown bears, Katmai National Park and Preserve, and concerned conservationist

PC207

Name: Jacob Murphh

Community of Residence: Delta Junction

Comment:

I support the use a cellular game cameras for black and brown bears over bait.

#3

PC208

Name: Kathy Zimmerman, N/A

Community of Residence: Hollywood, Florida

Comment:

Proposal #33 and Proposal #59

OPPOSE

There is no valid explanation or scientific basis for culling the Wolf and Black Bear population. In addition, there is no ability for the wildlife population to retreat from aerial assault. The road to recovery for sustainable populations for Wolves and Black Bears, to maintain ecological balance within the region, can take a generations.

Yellowstone Park reintroduction of wolves gives an outstanding example of the benefit of wolves and bears to the region. As we have seen in various regions, an overabundance of Moose, Deer and other ruminants, can destroy the flora, leading to a breakdown of the whole ecosystem.

Thank you,

Kathy Zimmerman

PC209

Name: Gregor Graham, NatHab

Community of Residence: Salmo BC

Comment:

Opposed to Proposal 75. Protect wolves and bears. Prioritize wildlife viewing over hunting!

Decades of predator control have failed to show scientific or practical benefits for prey populations.

Support for Proposal 11. Shorten the duration of the brown bear hunt.

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: 12/20/2024

Mr. Stosh Hoffman, 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 Hoffman,

The National Park Service (NPS) appreciates the opportunity to comment on proposals for the Central and Southwest Region being considered by the Alaska Board of Game. Below are our recommendations on proposals that affect or have the potential to affect NPS areas.

Proposals such as Proposal 2. NPS Recommendation: Exclude NPS-managed lands.

Bear baiting is not allowed on NPS-managed lands except under certain exemptions. Therefore, if the Board adopts this proposal in Game Management Units (GMUs) including NPS-managed lands (9, 11, 13, 16, and 17), **NPS-managed lands should be excluded.**

Proposal 11. NPS Recommendation: Neutral.

The NPS acknowledges that the overlap between the hunting season and activities such as angling and bear viewing results in potential conflicts among user groups. The NPS has received comments expressing concerns that highlight the differing values of these groups, as well as associated safety concerns. The underlying issues are complex, and we believe the best solution would involve consideration of input from all user groups. Accordingly, despite the concerns raised, the NPS is neutral regarding the current proposal.

Proposal 18. NPS Recommendation: Oppose.

The NPS opposes wildlife proposal 18 which would shorten the spring and fall brown bear hunting seasons in GMU 9C for residents and nonresidents and convert hunts to drawing permit hunts. Perceived declines in brown bear density could result from low salmon returns rather than small shifts in the hunting season. For example, the 2023 sockeye salmon return for the Alagnak River was among the lowest ever recorded. Hunting within the preserve is authorized and managed by the NPS via concession contracts. This allows the NPS to closely monitor and manage guided harvest, which has been relatively consistent over decades. Conversely, within the preserve, a recent expansion of human activities in the areas surrounding Moraine Drainage, Funnel Creek and Battle River has occurred. The NPS is interested to work collaboratively with stakeholders to address shared issues of concern, including the maintenance of high concentrations of brown bears in Katmai National Park and Preserve.

Proposal 22. NPS Recommendation: Support.

The NPS supports wildlife proposal 22 to shorten the wolverine hunting season in GMU 9. While data on timing of wolverine reproduction is limited and variable, onset of breeding activity has been documented in March (Banci & Harestad 1988, Blomqvist 1995), supporting the observations of the proponent. Additionally, research by Kukka et al. (2017) indicates that the percentage of adults, particularly adult females, in the harvest may increase later in the season. Harvesting reproductive adults, especially adult females, can disproportionately impact long-term population viability. Given the lack of robust population data, using these metrics to reduce harvest of breeding adults can support species conservation. If this pattern of increased adult harvest later in the season is true in GMU 9 it would support an earlier conclusion to the hunting season.

Proposals 28 and 29. NPS Recommendation: Support.

The NPS supports reducing population and harvest objectives for moose in GMU 17B and reviewing the Intensive Management and harvest objectives for the Mulchatna Caribou Herd to consider changes in herd distribution and habitat quality. Population and harvest objectives should be informed by current habitat quality assessments and population surveys rather than past desired, but likely unattainable, scenarios.

Proposals such as Proposal 33, 34 and 75. NPS Recommendation: Exclude NPS-managed lands.

Proposals 33 and 34 would allow for the take of brown bears and wolves in GMU 17 the same day a person has been airborne. Proposal 75 requests to add the option for

departmental removal of wolves, brown bears, and black bears to the GMU 16 Intensive Management Plan.

These State authorized predator control and Intensive Management strategies are not consistent with NPS 2006 Management Policy 4.4.3 and therefore are not allowed on NPS managed lands. Intensive Management programs are authorized under non-hunting regulations, and therefore they require NPS approval on national preserves. Same day airborne hunting is further not permitted under 36 CFR 13.42 (d). If the Board adopts these proposals, **NPS lands should be excluded from predator control efforts.**

Thank you for the opportunity to comment on these important wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact me.

Sincerely,

GRANT HILDERBRAND

Digitally signed by GRANT HILDERBRAND
Date: 2024.12.20 09:08:15 -09'00'

Grant Hilderbrand, Ph.D., C.W.B.
Associate Regional Director - Resources
National Park Service - Alaska Region

cc:
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Sarah Creachbaum, Regional Director, National Park Service, Alaska Region
Sara Boario, Regional Director, U.S. Fish and Wildlife Service
Superintendents, National Park Service, Alaska Region

References:

Banci, V. and A. S. Harestad. 1988. Reproduction and natality of wolverine (*Gulo gulo*) in Yukon. *Annales Zoologici Fennici* 25, 265–270.

Blomqvist, L. 1995. Reproductive parameters of wolverines *(Gulo gulo)* in captivity. *Annales Zoologigici Fennici* 32, 441–444. Google Scholar.

Kukka, P.M., Jung, T. S., Robitaille, J.F., and F.K.A. Schmiegelow. 2017. Temporal variation in the population characteristics of harvested wolverine (*Gulo gulo*) in northwestern Canada. *Wildlife Research* 44(6-7), 497–503. https://doi.org/10.1071/WR17063.

PC211

Name: Melodie Nelson

Community of Residence: Williston North Dakota

Comment:

Regarding Proposal 73 5AAC 92.122. I don't think it's a good idea for your tourism for them to be aware that the wildlife they travel many miles to observe are being maliciously gunned down. We consider Alaska the last frontier and the last refuge for them. Please don't allow this. Thank you in advance.

PC212

Name: John Nichols

Community of Residence: Chugiak

Comment:

Proposal 79. I support this proposal, to extend the wolf season in Unit 14A to April 30. Not only would this proposal provide more opportunity to pursue wolves in this unit, but would make the 14A the wolf season closure consistent with nearby units. Simplification of and consistency of regulations across within regions should be the goal wherever practical. I support this proposal.

Proposal 80. I oppose this proposal that would require sealing of beaver in Unit 16. Beaver seem to be thriving in the unit, and trapper effort has decreased significantly over the last couple of decades. The increased number of beavers has lead to beaver damage complaints. Sealing would add an unnecessary layer of complication and effort to trapping, likely resulting in decreased trapping efforts and increased beaver damage complaints. I oppose this proposal.

Proposal 81. I oppose this proposal to require traps and snare set within 2 miles of a publicly-maintained road to be checked at least 36 hours in Unit 14A. Mandated minimum check laws ignore the reality of Alaskan weather. It is simply not safe to check traps during harsh winter storms, which can occur unexpectedly and without regard to a 36 hour check requirement. Trappers must be allowed be allowed to select safe weather periods in which to check traps. Mandating a 36 hour check would also conflict with most trappers' work schedules. I oppose this proposal.

Proposal 82. I support this proposal, to apply additional restrictions on trapping within 50 yards of popular trails in Units 13, 14 and 16. Although I generally oppose regulations which add complexity to regulations, this proposal will decrease the chances of dogs being caught in traps. Prohibiting the use of traps within 50 yards of heavily-used public trails (except for traps which are elevated, enclosed, or underwater and therefore unlikely to be contacted by dogs) seems a common-sense solution to a user-conflict issue. Clearly delineating these trails in the regulations will be very important, however, as many 'trails' where people can walk their dogs were actually cleared and maintained by trappers. I support this proposal.

PC213

Name: Raven Nichols

Community of Residence: Atlanta, Georgia

Comment:

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation.

Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover.

Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature’s balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive. Thank you for listening.

PC214

Name: Cassi Nickles

Community of Residence: Wasilla

Comment:

I am writing in support of proposal #3 submitted by Caleb Martin.

I think the cell camera usage for bear baiting SHOULD be allowed for use of hunting bears over bait. Currently you can fly and land 300 feet away from them the same day. With the airplane flying I see no more advantage than that of an airplane, actually a plane is significantly more efficient in landing and killing immediately because they can spot them in the open.

There is also not any advantage that someone would have service and enough time to go travel to the bait that is hours away (typically) and kill a bear that they initially got text from.

In my bear baiting experience, if a bear was on the bait, it has smelled/heard us and got pushed off and doesn't come back for a few days, if at all (esp a big boar).

Also, for supporting proposal 70 to extend brown bear season in 14a and 14b as there are too many brown bears in these units now.

PC215

Name: Dominic Nickles

Community of Residence: Wasilla

Comment:

Support Proposals 3 and 70

Proposal 3- In the areas this proposal covers you can fly and hunt brown bears and black bears the same day as long as you are 300' from the plane and over bait. Cellular cameras should be legal to use, it's just another tool to help hunters harvest bears in an areas that already have an abundance of bears. It helps the hunter by knowing when the baits been hit/ or when it needs rebaited in stead of wasting fuel and time to discover the bait hasn't been touched. Specially for most hunters whose baits are hours away. From my experience and checking baits, I have seen multiple times after checking the cameras there was a bear on the bait that ran off when it heard us coming. It is also a security concern if you are walking in and there is a sow with cubs on the bait, maybe you want to wait until they are gone. Or if people are walking in with younger children. If guides and other individuals can fly and hunt bears over bait the same day, why can't people have the same equality with camera if they can't afford a plane.

Proposal 70 - Extending brown bears in these units would be beneficial for hunters since the springs have been so late and also to help the moose population. I have baited in 14B for the last 10 years, very rarely do we get an early spring. Most of the time browns bears don't show up until the first week of June. Then they proceed to run the black bears out of the area. Fish and game has said there is no biological concern to extending the season. With the surplus of brown bears in these units why not give hunters the opportunity to harvest them, their hides are still good until mid June.

PC216

Name: Mary Nicolini

Community of Residence: California

Comment:

Hello,

As a frequent visitor to Alaska, I strongly oppose Proposal 75 - Aerial Gunning Outside of Denali. One of the main reasons I visit Alaska is to specifically see the wildlife (brown bears, black bears and wolves.

Studies have shown that Alaska's predator control programs — aimed at boosting moose, caribou, and deer populations for hunters — do not increase human moose harvest.

Large carnivore management in Alaska is a reversion to outdated management concepts and occurs without effective monitoring programs designed to scientifically evaluate impacts on predator populations or identify causal relationships between predator control and pre-population dynamics.

If approved, this proposal would give ADFG full reign to implement an aerial gunning plan in Unit 16. Once a proposal like this is approved, ADFG has the authority to develop an Operational Plan for aerial gunning that is not open to public comment.

However, I do support Proposal 82 - Palmer Trapping Setbacks.

his was a negotiated outcome. Originally submitted in 2022, the BOG deferred the proposal until a stakeholder meeting between trappers and nontrappers could be held to discuss the setback proposal. The meeting adjourned with consensus on the setback locations and conditions listed in the proposal.

Trapping setbacks are popular, easy to put in place, and seem to work; they have been successful in Unit 1C in Juneau and in the Anchorage municipality.

The setback distance is small enough to not significantly reduce the BOG's ability to manage wildlife.

Trapping setbacks on these popular trails would help reduce incidental trap encounters with recreationists and their dogs.

I strongly support Proposal 11 - Shortened Brown Bear Seasons Near Katmai. I have been fortunate to spend time in Katmai NP and it has been the highlight of my life to watch the bears and other wildlife in their natural habitat.

With the early season hunt, operators were still dropping off sport fishermen and wildlife viewers on rivers where bear hunting was taking place. Hunting camps and hunters were occupying critical habitats where bears were fishing, forcing other users to avoid these areas.

Bears were shot right at the outlet of the Kulik River. The Kulik Lodge had employees breaking down camp, there were several groups of sport fishermen on the river as well as wildlife viewers. A bear had cached a hunter-shot carcass right at the outlet of the Kulik River where aircraft picked up sport fishermen and other visitors.

This proposal would restore the hunting season to the pre-2022 length and would reduce human-wildlife conflicts.

I also support Proposal 29 - Mulchatna Caribou Herd Population Review

The Mulchatna caribou herd has changed continuously from the time monitoring began. The current population objective (30,000-80,000) was established in 2008 at which point the population was estimated to be 30,000. This objective has been achieved only once since then.

Habitat quality has likely changed since the last population objective was established, and a new review should take this into consideration as it has almost certainly reduced population potential.

A review of the population and harvest objective for the MCH would provide valuable data to inform game management and the Mulchatna Predator Control Program.

Thank you for your consideration.

Sincerely,

Mary Nicolini

PC217

Name: Kristen Nieves

Community of Residence: Portland OR

Comment:

I am in opposition of proposal 17 as it us important to respect the wildlife and their existence in the area.

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.B24075

December 20 2024

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

Dear Chairman Hoffman:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Game proposals during the January 10-17, 2025 Central & Southwest Region 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 George Pappas, State Subsistence Liaison, 907-786-3822 or george_pappas@ios.doi.gov, with any questions you may have concerning this material.

Sincerely,

Scott Ayers
Acting Director

Enclosure

cc: Federal Subsistence Board

Office of Subsistence Management
Interagency Staff Committee
Southcentral Alaska Subsistence Regional Advisory Council
Kodiak/Aleutians Subsistence Regional Advisory Council
Bristol Bay 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

Central & Southwest Region Meeting
January 10 – 17, 2025
Wasilla, Alaska

Office of Subsistence Management (OSM)

PROPOSAL 1 – 5 AAC 92.015. Brown bear tag fee exemption.

Reauthorize the brown bear tag fee exemptions for the Central and Southwest Region Units 11, 13, 16A, 16B, and 17.

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 eliminate the requirement that federally qualified subsistence users purchase a $25 tag before hunting brown bears in these units. This decreases cost and maintains opportunity for federally qualified subsistence users.

PROPOSAL 2 – 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.
5 AAC 95.052. Discretionary permit hunt conditions and procedures.

Open two bear baiting seasons in Units 9, 11, 13, 14B, 14C, 16, and 17 where bear baiting is legal.

Note: These comments only apply to Units 9, 11, 13, 16, and 17. OSM has no position on this proposal for Units 14B and 14C.

Current Federal Regulations:

Bear Baiting

Unit 11—You may use bait to hunt black and brown bear between April 15 and June 15.

Unit 13—You may use bait to hunt black bear between April 15 and June 15.

Unit 16—You may use bait to hunt black bear between April 15 and June 15.

Unit 17— You may use bait to hunt black between April 15 and June 15.

Bear baiting is not authorized in Unit 9 under Federal subsistence regulations.

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

Impact to Federal subsistence users/wildlife: This would provide additional opportunity for federally qualified subsistence users hunting under State regulations. This proposal would further misalign State and Federal regulation, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

Impacts on the bear population are uncertain. Current biological and harvest information are sparse, hindering effective evaluation of this regulation change on brown and black bear populations. In Units 11 and 13, biological and harvest data are not collected, although most bears in these units are harvested in the spring over bait (Hatcher 2023). Black bear regulations are extremely liberal throughout the region, including 3 – 5 bear harvest limits and year-round seasons, indicating no conservation concerns. In Unit 16, black bears are part of a predation control program (ADF&G 2019, Brockman 2024).

Brown bear baiting is not permitted under State regulations in Unit 9, so this proposal will not affect Unit 9 brown bear harvest. In Units 16 and 17, the harvest limit is 2 brown bears, indicating no conservation concerns for brown bear in these units. Brown bears are also part of a predator control program in Unit 16 (ADF&G 2019). In Units 11 and 13, the brown bear harvest limit is one bear. While harvest may increase in these units due to more opportunity, the harvest limit would curtail large increases as hunter participation is likely limited.

However, the Unit 13 portion of this proposal should be considered in conjunction with Proposal 57, which requests increasing the brown bear harvest limit in Unit 13 to two bears as providing an additional baiting season and also increasing the harvest limit could have compounding effects on harvest increases and associated conservation concerns, especially since most bear harvest occurs over bait and much of Unit 13 is road-accessible. Brown bears are often managed conservatively because they have large home ranges and low reproductive rates (Miller 2011). The BOG may also want to consider the interactive effects of Proposal 3, requesting the use of cellular cameras for bear baiting, if adopted.

Federal Position/Recommended Action: The OSM recommendation is to **support** the proposal for black bear in all units and for brown bear in Units 16 and 17 and is **neutral** for brown bear in Units 11 and 13.

Rationale: This proposal would increase opportunity for federally qualified subsistence users hunting under State regulations. While conservation concerns are difficult to assess, they seem unlikely for black bears given the liberal seasons and harvest limits across the region. Similarly, conservation concerns seem unlikely for brown bears in Units 16 and 17 given the two bear harvest limits and predator control program in Unit 16. However, impacts to the brown bear population in Units 11 and 13 are particularly uncertain given the lack of monitoring and harvest data. The more conservative harvest limit of one bear may indicate lower brown bear populations but would also limit total harvest. While unknown, OSM suspects total harvest pressure on bears in all affected units is relatively low and would not substantially increase if this proposal is adopted.

Literature Cited

ADF&G. 2019. Annual report to the Alaska Board of Game on Intensive Management for Moose with Wolf, Black Bear, and Brown Bear Predation Control in Game Management Unit 16. Alaska Department of Fish and Game. Division of Wildlife Conservation. February 2019.

Brockman, C. J. 2024. Black bear management report and plan, Game Management Unit 16: Report period 1 July 2013–30 June 2018 and plan period 1 July 2018–30 June 2023. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2024-4, Juneau.

Hatcher, H. L. 2023. Black bear management report and plan, Game Management Units 11 and 13: Report period 1 July 2013–30 June 2018, and plan period 1 July 2018–30 June 2023. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-22, Juneau.

Miller, S.D., J.W. Schoen, J. Faro, D.R. Klein. 2011. Trends in intensive management of Alaska's grizzly bears, 1980-2010. The Journal of Wildlife Management. 75(6): 1243-1252.

PROPOSAL 3 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.

Allow the use of cellular cameras for the taking black bear and brown bear over bait in Units 9, 11, 13, 14B, 16, and 17.

Current Federal Regulations:

§100.26(b) Prohibited methods and means.

(8) Using or being aided by use of a pit, fire, artificial light, radio communication, artificial salt lick, explosive, barbed arrow, bomb, smoke, chemical, conventional steel trap with a jaw spread over 9 inches, or conibear style trap with a jaw spread over 11 inches.

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

Impact to Federal subsistence users/wildlife: If this proposal is adopted, users would be able to deploy cameras over bear bait that uses cellular networks under State regulations. This would allow users the ability, depending on the model of camera used, to see delayed images or video in real time. This would increase opportunity for federally qualified subsistence users hunting under State regulations, but also requires technological investment and capabilities. Adoption of this proposal could result in increased bear harvests but is not expected to substantially impact any bear populations.

Adoption of this proposal would increase regulatory complexity and law enforcement concerns by misaligning State and Federal regulations. These cellular cameras use radio communication, which is currently prohibited under Federal subsistence regulations. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 3.

Rationale: This proposal will provide federally qualified subsistence users the ability to use cellular cameras for the taking of black bear and brown bear over bait under State regulations. There are currently no Federal subsistence regulations restricting or allowing the use of this technology. However, use of radio communication is prohibited under Federal regulations.

PROPOSAL 7 – 5 AAC 85.025(4). Hunting seasons and bag limits for caribou.
Extend the fall Southern Alaska Peninsula caribou season for residents and nonresidents.

Note: OSM's comments only apply to the resident season portion of this proposal. OSM has no position on the nonresident season portion.

Current Federal Regulations:

Unit 9D—Caribou	
Unit 9D—1-4 caribou by Federal registration permit (FC0909) only.	*Aug. 1-Sep. 30* *Nov. 15 – Mar. 31*

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

Impact to Federal subsistence users/wildlife: This proposal would increase opportunity for federally qualified subsistence users hunting under State regulations. It would also misalign State and Federal fall seasons, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

According to ADF&G in their proposal, the Southern Alaska Peninsula caribou herd is above management objectives, while resident harvest remains extremely low (BBRAC 2024). Lengthening the season may increase harvest, helping to keep the population within sustainable levels and avoid a crash.

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

Rationale: This proposal will increase opportunity for federally qualified subsistence users and may reduce conservation concerns by helping to keep the Southern Alaska Peninsula Caribou Herd (SAPCH) within sustainable levels.

Literature Cited

BBRAC. 2024. Transcripts of the Bristol Bay Subsistence Reginal Advisory Council proceedings. October 30, 2024. Anchorage, AK. Office of Subsistence Management, Anchorage, AK.

PROPOSAL 9 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears.
Lengthen the spring and fall brown bear hunting season in Unit 9.

Note: These comments only apply to the resident hunt portion of the proposal in Units 9B, 9C, and 9E, and do not apply to Units 9A, 9D or the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 9—Brown bear	
Unit 9A and 9D	*No Federal open season*
Unit 9B Lake Clark National Park and Preserve–Residents of Iliamna, Newhalen, Nondalton, Pedro Bay, and Port Alsworth; residents of that portion of the park resident zone in Unit 9B; and 13.440 permit holders–1 bear by Federal registration permit (FB0911) only. *The season will be closed by the Lake Clark National Park and Preserve Superintendent when four females or ten bears have been taken, whichever occurs first.*	*July 1 – June 30*
Unit 9B remainder–1 bear by State registration permit only.	*Sep. 1 – May 31*
Unit 9C–1 bear by Federal registration permit (FB0906) only. The season will be closed by the Katmai National Park and Preserve Superintendent in consultation with BLM and FWS land managers and ADF&G, when six female or 10 bears have been taken, whichever occurs first.	*Oct. 1 – May 31*
Unit 9E–1 bear by Federal registration permit (FB0910) only.	*Sep. 25 – Dec. 31* *Apr. 15 – May 25*

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

Impact to Federal subsistence users/wildlife: Adopting this proposal increases harvest opportunity for federally qualified subsistence users hunting under State regulations. However, the RB368, RB369, and RB370 registration permit hunts are not subsistence hunts and are not likely utilized often by federally qualified subsistence users. Federally qualified subsistence users currently have much more hunting opportunity for Unit 9 brown bears under Federal subsistence regulations.

While all of these hunts are closed for the 2024/25 regulatory year, the season dates in the AAC already match the proponent's request for Unit 9C and the spring Unit 9B and 9E resident seasons, while the

codified season dates for the Unit 9B fall season are actually longer than the dates requested in the proposal. Therefore, the proposal only seems to apply to the Unit 9E fall resident season.

Impacts to the Unit 9E brown bear population are uncertain. OSM does not have sufficient biological or harvest information to effectively evaluate if there are any conservation concerns associated with extending the Unit 9E fall resident season by six days.

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

Rationale: This proposal would marginally increase opportunity for federally qualified subsistence users. Conservation concerns are unknown, although the biennial hunt structure of the RB368, RB369, and RB370 permit hunts, indicate possible conservation concerns.

PROPOSAL 11 – 5 AAC 85.020. Hunting season and bag limits for brown bear.
Shorten the spring and fall brown bear hunting season in Unit 9C by one week for residents and nonresidents.

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 9C—Brown bear

Unit 9C–1 bear by Federal registration permit (FB0906) only. The season will be closed by the Katmai National Park and Preserve Superintendent in consultation with BLM, FWS and ADF&G, when six female or 10 bears have been taken, whichever occurs first.	*Oct. 1 – May 31*

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

Impact to Federal subsistence users/wildlife: This proposal would decrease opportunity for federally qualified subsistence users hunting under State regulations. However, the RB368 and RB370 registration permit hunts are not subsistence hunts and are not likely utilized often by federally qualified subsistence users. Federally qualified subsistence users currently have much more hunting opportunity for Unit 9C brown bears under Federal regulations.

Impacts to the Unit 9C brown bear population are uncertain. OSM does not have sufficient biological or harvest information to effectively evaluate if conservation concerns warrant shortening the Unit 9C brown bear seasons. However, the biennial structure of these hunts suggests potential conservation concerns.

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

Rationale: This proposal would marginally decrease opportunity for federally qualified subsistence users. Conservation concerns are unknown, although the biennial hunt structure of the RB368 and RB370 permit hunts indicate possible conservation concerns.

PROPOSAL 12 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears.
Lengthen the fall brown bear hunting seasons in Units 9D and 9E for both residents and nonresidents.

Note: These comments only apply to the resident hunt portion in Unit 9E and do not apply to the nonresident hunt or Unit 9D portions of this proposal.

Current Federal Regulations:

Unit 9 —Brown bear

Unit 9A and 9D	*No Federal open season*
Unit 9E–1 bear by Federal registration permit (FB0910) only.	*Sept. 24 – Dec. 31* *Apr. 15 – May 25*

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

Impact to Federal subsistence users/wildlife: Adopting this proposal increases harvest opportunity for federally qualified subsistence users hunting under State regulations. However, the RB368 and RB370 registration permit hunts are not subsistence hunts and are not likely utilized often by federally qualified subsistence users. Federally qualified subsistence users currently have much more hunting opportunity for Unit 9E brown bears under Federal regulations.

Impacts to the Unit 9E brown bear population are uncertain. OSM does not have sufficient biological or harvest information to effectively evaluate if there are any conservation concerns associated with extending the Unit 9E fall resident season by six days. However, the biennial hunt structure of these hunts suggest conservation concerns.

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

Rationale: This proposal would marginally increase opportunity for federally qualified subsistence users. Conservation concerns are unknown, although the biennial hunt structure of the RB368 and RB370 permit hunts indicate possible conservation concerns.

PROPOSAL 13 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears.
Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents and lengthen the nonresident spring season.

See comments on Proposal 12.

PROPOSAL 14 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears.
Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents.

See comments on Proposal 12.

PROPOSAL 16 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears.
Lengthen the fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents.

See comments on Proposal 12.

PROPOSAL 17 – 5 AAC 85.020. Hunting seasons and bag limits for brown bears.
Lengthen the spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents.

See comments on Proposal 12.

PROPOSAL 18 – 5 AAC 85.020. Hunting seasons and bag limit for brown bear.
Shorten the spring and fall brown bear hunting seasons in Unit 9C for residents and nonresidents and convert to drawing permits hunts.

See comments on Proposal 11.

PROPOSAL 19 - 5 AAC 85.060. Hunting seasons and bag limits for fur animals.
Establish a hunting season and nonresident bag limit for Arctic fox on the Pribilof Islands in Unit 10.

Note: OSM's comment only applies to the resident season portion of this proposal. OSM has no position on the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 10—Arctic Fox Hunting

No limit (blue and white phases)	*July 1-June 30.*

Unit 10—Arctic Fox Trapping

No limit (blue and white phases)	*July 1-June 30.*

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

Impact to Federal subsistence users/wildlife: This proposal would decrease hunting opportunity for federally qualified subsistence users under State regulations, although they could still hunt fox year-round on Federal public lands under Federal regulations. Adoption of this proposal would increase regulatory complexity by misaligning State and Federal hunting seasons. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

Prior to widespread introduction to many Aleutian Islands in the 18th century, Arctic foxes primarily lived on uninhabited Commander and Pribilof islands (Tatarenkova 2021). According to the proponent in their proposal, Pribilof fox populations appear to be in decline, existing in low numbers with a substantial decline in the number of active dens. Adoption of this proposal may decrease harvest of Arctic foxes during the breeding season on non-Federal lands, helping to maintain and increase the population. However, harvest could still occur on Federal public lands year-round by federally qualified subsistence users. The proposed shortened season would also curtail local residents' ability to deal with problem animals in town.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 19.

Rationale: This proposal would decrease opportunity for federally qualified subsistence users under State regulations but may help conserve the Arctic fox population.

Literature Cited

Tatarenkova, N. A. 2021. The Arctic Fox Trade in The Commander and Aleutian Islands. Integrated Studies of Island Communities of the Far East: 65.

PROPOSAL 21 - 5 AAC 84.270 Furbearer trapping.

Remove the two per day bag limit for beaver when taken by firearm during April 15–May 31 in Unit 9.

Current Federal Regulations:

Unit 9—Beaver Hunting

Units 9B and 9E—2 beavers per day	*Apr. 15-May 31.*

Unit 9—Beaver Trapping

No limit	*Oct. 10-Mar. 31.*

2 beavers per day; only firearms may be used *Apr. 15-May 31.*

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

Impact to Federal subsistence users/wildlife: This proposal would increase opportunity for federally qualified subsistence users by removing the bag limit and firearm restriction from Apr. 15- May 31 under State trapping regulations. While Federal regulations are already more restrictive than State regulations, this proposal further misaligns them. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

According to ADF&G in their proposal, Unit 9 beaver populations are healthy and there are no conservation concerns. No impacts to the beaver population are expected. This is a housekeeping proposal as State hunting regulations for beaver are year-round with no limit, so restricting users with a trapping license to only two beavers by firearm from Apr. 15-May 31 is unnecessary.

Federal Position/Recommended Action: The OSM recommendation to **support** Proposal 21.

Rationale: This proposal would increase opportunity for federally qualified subsistence users under State trapping regulations, simplifies State regulations, and there are no conservation concerns.

PROPOSAL 22 - 5 AAC 85.057. Hunting seasons and bag limits for wolverine.
Shorten the season for hunting wolverine in Unit 9 for both residents and nonresidents.

Note: OSM's comment only applies to the resident season portion of this proposal. OSM has no position on the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 9—Wolverine Hunting

Unit 9—1 wolverine *Sep. 1-Mar. 31.*

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

Impact to Federal subsistence users/wildlife: This proposal would reduce harvest opportunity for federally qualified subsistence users under State regulations. Additionally, adoption of this proposal would misalign closing dates between Federal and State regulations, increasing regulatory complexity and potentially, law enforcement concerns. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Little impact on the wolverine population is expected. While this proposal is intended to protect denning females, adoption of this proposal would likely have little impact on the wolverine population in Unit 9.

The trapping harvest limit is 'no limit', while the hunting harvest limit is only one, and generally, most wolverines are harvested via trapping versus hunting (Bogle 2023). From 2017-2022, Region IV wolverine harvest from sealing records averaged 141 wolverines per year, accounting for about 31% of the total reported harvest of wolverines statewide (Bogle 2023). From 2015-2020, wolverine harvest in Unit 9 averaged 16/year. The number of successful trappers in Unit 9 has also declined substantially from the 1980s to 2020 from about 90 to less than 30 trappers/year (ADF&G 2022), indicating harvest pressure is quite low. The relative abundance of wolverines in Unit 9 is considered scarce and reported harvest from the 2022 trapper questionnaire was only one in Unit 9, although reporting is voluntary (Bogle 2023).

Federal Position/Recommended Action: The OSM recommendation is **neutral** to Proposal 22.

Rationale: Adopting this proposal decreases opportunity for federally qualified subsistence users. While conservation concerns seem minimal due to low hunting pressure and harvest limits, limited harvest and biological data preclude full evaluation of conservation concerns.

Literature Cited

ADF&G. 2022. RC4 Tab 4.1 King Salmon Area Proposals. Presentation to the Board of Game. Central & Southwest Region Meeting. January 21–29, 2022. Wasilla, AK. Division of Wildlife Conservation.

Bogle, S. E. 2023. 2022 Alaska Trapper Report: 1 July 2022-30 June 2023. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2023-3, Juneau.

PROPOSAL 24 - 5 AAC 85.065. Hunting seasons and bag limits for small game.

Close the season for Alaska hares in Units 9 and 17.

Current Federal Regulations:

Unit 9—Hare, Alaska

1 per day, 4 per season	*Nov. 1-Mar. 31.*

Unit 17— Hare, Alaska

1 per day, 4 per season	*Nov. 1-Mar. 31.*

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

Impact to Federal subsistence users/wildlife: Closing the hunting season for Alaska hare would decrease harvest opportunity for federally qualified subsistence users under State regulations, although harvest is likely low.

However, conservation concerns exist for Alaska Hare as current abundance appears low and well below historic levels throughout its range (Merizon and Carroll 2019). According to ADF&G in their proposal,

recent surveys documented extremely low abundance and absences from historical ranges. While the impact of human harvest on these declines is unknown, eliminating harvest may help maintain and recover Alaska hare populations.

Adopting this proposal would also misalign Federal and State regulations, increasing regulatory complexity and potentially, law enforcement concerns. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation to **support** Proposal 24.

Rationale: Severe conservation concerns exist for Alaska Hares throughout its range. While adopting this proposal would reduce harvest opportunity for federally qualified subsistence users under State regulations in the short-term, it could help ensure future harvest opportunity.

Literature Cited

Merizon, R.A. and C.J. Carroll. 2019. Status of grouse, ptarmigan, and hare in Alaska, 2017 and 2018. ADF&G. Juneau, AK.

PROPOSAL 27 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 17A.

Current Federal Regulations:

Unit 17A—Moose	
Unit 17A—1 bull by State registration permit	*Aug. 25-Sep. 25.*
OR	
1 antlerless moose by State registration permit	*Aug. 25-Sep. 25*
OR	
Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit	*Up to a 31-day season may be announced between Dec. 1-last day of Feb.*

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

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose. According to ADF&G in their proposal, the Unit 17A moose population is currently above management objectives and can withstand additional harvest. The antlerless hunt in the fall and winter is warranted to limit population growth and allow hunters to harvest surplus animals.

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

Rationale: No conservation concerns exist as the moose population is currently above State objectives and additional harvest could help prevent habitat degradation. This proposal also increases opportunity and the ability to plan for winter hunts for federally qualified subsistence users.

PROPOSAL 30 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.
Implement a three-year moratorium on caribou hunting in Units 9B, 17, and 19.

Current Federal Regulations:

Unit 9B—Caribou	
Unit 9B—up to 2 caribou by State registration permit	*Season may be announced between Aug. 1-Mar. 31.*
Unit 17—Caribou	
Unit 17, all drainages west of Right Hand Point—up to 2 caribou by State registration permit.	*Season may be announced between Aug. 1 – Mar. 31*
Units 17A and 17C, that portion of 17A east of the Ungalikthluk River and South of Buchia Ridge, and within the lower Kulukak River drainage south of Buchia Ridge and within the Kanik River drainage downstream of the Tithe Creek, that portion of 17C south of the Igushik River and south of and including the Tuklung river drainage—up to 5 caribou by Federal registration permit (FC1702)	*Aug. 1 – Mar. 31*
Federal public lands are closed to the harvest of caribou except by Federally qualified subsistence users unless the population estimate exceeds 900 caribou.	
Units 17A remainder and 17C remainder—Selected drainages, a harvest limit of up to 2 caribou by State registration permit will be determined at the time the season is announced.	*Season may be announced between Aug. 1 – Mar. 31*
Units 17B and that portion of 17C east of the Wood River and Wood River Lakes—up to 2 caribou by State registration permit.	*Season may be announced between Aug. 1 – Mar. 31*
Unit 19—Caribou	
Units 19A, 19B, and 19E (excluding residents of Lime Village)—up to 2 caribou by State registration permit.	*Season may be announced between Aug. 1 – Mar. 15*

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

Impact to Federal subsistence users/wildlife: The adoption of this proposal would minimally impact federally qualified subsistence users. Currently, there is no open season under State regulations for caribou in Units 9B, 17, and 19, while under Federal subsistence regulations, the season is to-be-announced. However, no Federal season has been announced in recent years due to conservation concerns.

This proposal would also not impact the Mulchatna Caribou Herd since State and Federal seasons are already closed, and therefore, no legal harvest has occurred. The Mulchatna caribou count was 13,500 in 2020, down from 200,000 in 1996 (OSM 2022). The herd has remained at very low levels (12,507 in 2023), well below population objectives, and currently is unable to sustain any harvest.

However, if the Mulchatna herd recovers sufficiently over the next three years to allow for some harvest, the current State regulations provide the flexibility to open a season. This flexibility could benefit federally qualified subsistence users by providing harvest opportunity as soon as practicable and helping to meet subsistence needs. However, a harvestable surplus is not expected to be available within the next three years, and a moratorium provides certainty to hunters that the hunt will remain closed and messages that managers and the Board are focused on herd recovery (BOG 2024). If a harvestable surplus does become available, an emergency petition could be submitted to open the hunt and provide subsistence opportunity (BOG 2024). A moratorium is also consistent with the Board of Game's (BOG's) action on Proposal 6 in 2024, implementing a 3-year moratorium in Unit 18.

While the proposal is focused on Mulchatna caribou, it includes all of Unit 17, which also has hunts for Nushagak caribou. Nushagak caribou are managed under a separate, RC501 registration permit and should be exempted from this 3-year moratorium. In contrast, Units 9A and portions of 9C are excluded from this proposal but are managed under the RC503 Mulchatna caribou permit. The BOG should consider extending the moratorium to these units for consistency if they choose to adopt this proposal.

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 in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal for the Mulchatna herd and **opposes** this proposal for the Nushagak herd.

Rationale: The State hunt is already closed to minimize harvest of Mulchatna caribou until the herd has recovered. ADF&G will only open a hunt when a harvestable surplus is available (ADF&G 2024). The current regulations allow for the flexibility needed to manage the Mulchatna Caribou Herd.

While OSM considers a moratorium unnecessary, enacting a moratorium for the Mulchatna herd in the Central/Southwest Region would maintain consistency with Unit 18. It also provides certainty to hunters that the hunt will remain closed as a harvestable surplus in unlikely to be available within the next three years (BOG 2024).

If the BOG adopts this proposal, OSM encourages consideration of also including Units 9A and portion of Unit 9C, so that the entire RC503 permit area is managed consistently. However, OSM opposes enacting a moratorium for the Nushagak herd, which is experiencing different population dynamics and managed under a different registration permit than the Mulchatna herd.

Literature Cited

ADF&G. 2024. Pages 25-28 *in* Alaska Department of Fish and Game Staff Comments for Proposals Western Arctic/Western Region Proposals Alaska Board of Game Meeting. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2023-2024/waw/adfg-comments-comp_waw.pdf. Kotzebue, Alaska. 106 pp.

BOG. 2024. Recording of the Western Arctic/Western Region Alaska Board of Game Meeting, January 26-29, 2024. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2023-2024/waw/index.html?mediaBasePath=/Meeting%2001-28-24%20%282%29%20%28Jan-28-24%206-08-56%20PM%29. Recording of the January 28, 2024, meeting. Kotzebue, AK

OSM. 2022. Staff analysis WP22-41. Pages 300-333 *in* Federal Subsistence Board Meeting Materials. April 15-22, 2022. Office of Subsistence Management, USFWS. Anchorage, AK. 1267.

PROPOSAL 31 – 5 AAC 85.020. Hunting seasons and bag limits for caribou.
Close the resident caribou season in Units 9B, 17, and 19.

See comments on Proposal 30.

PROPOSAL 32 – 5 AAC 85.020. Hunting season and bag limits for brown bear.
Allow the year-round take of brown bear in Unit 17.

Current Federal Regulations:

Unit 17—Brown bear

Unit 17—1 bear by State registration permit only	*Sep. 1-May 31*

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

Impact to Federal subsistence users/wildlife: This proposal would increase opportunity for federally qualified subsistence users hunting under State regulations. Adopting this proposal would further misalign State and Federal regulations, increasing regulatory complexity. Federal regulations are currently more restrictive than State regulations, with a later opening season date and a lower harvest limit. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

Impacts to the Unit 17 brown bear population are expected to be minimal. The two-bear harvest limit under State regulations indicates no conservation concerns. This proposal may not result in increased harvests but could improve harvest reporting and legalize the take of bears that is already occurring during summer months (BBRAC 2024). Total brown bears harvest in Unit 17 is uncertain. Hopefully this proposal will encourage people to report bears harvested year-round, providing more accurate harvest information (BBRAC 2024).

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

Rationale: This proposal increases opportunity for federally qualified subsistence users, there are no conservation concerns, and harvest reporting could improve.

Literature Cited

BBRAC. 2024. Transcripts of the Bristol Bay Subsistence Reginal Advisory Council proceedings. October 30, 2024. Anchorage, AK. Office of Subsistence Management, Anchorage, AK.

PROPOSAL 33 – 5 AAC 92.085. Unlawful methods of taking big game.
Allow the same day airborne take of brown bear and wolves in Unit 17.

Current Federal Regulations:

> **§ 100.26(b) Prohibited Methods and Means**
> * * * *
> *(16) Taking or assisting in the taking of ungulates, bear, wolves, wolverine, or other furbearers before 3a.m. following the day in which airborne travel occurred (except for flights in regularly scheduled commercial aircraft). This restriction does not apply to subsistence taking of deer (except on NPS lands) and of caribou on the Nushagak Peninsula (a portion of Units 17A and 17C) during Jan. 1-Mar. 31, provided the hunter is 300 feet from the airplane; moreover, this restriction does not apply to subsistence setting of snares or traps, or the removal of furbearers from traps or snares.*

Impact to Federal subsistence users/wildlife: Same day airborne take of wolves and bears is not permitted under Federal subsistence regulation. Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity.

Federal Position/Recommended Action: OSM has **no position** on this proposal.

PROPOSAL 34 – 5 AAC 92.085. Unlawful methods of taking big game.
Allow the same day airborne take of brown bear in Unit 17.

See comments for Proposal 33.

PROPOSAL 35 - 5 AAC 84.270. Furbearer trapping.
Shorten the trapping seasons for wolverine in Units 9 and 17, to the last day of February.

Current Federal Regulations:

Unit 9—Wolverine Trapping

No limit	*Nov. 10-Feb. 28.*

Unit 17— Wolverine Trapping

No limit	*Nov. 10-Feb. 28.*

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

Impact to Federal subsistence users/wildlife: Adoption of this proposal would reduce opportunity to harvest wolverines for federally qualified subsistence users under State trapping regulations. However, it would align State and Federal regulations for Units 9 and 17, reducing regulatory complexity.

From 2017-2022, Region IV wolverine harvest from sealing records averaged 141 wolverines per year, accounting for about 31% of the total reported harvest of wolverines statewide. The relative abundance of wolverines in Units 9 and 17 are considered scarce and reported harvest from the 2022 trapper questionnaire was one in Unit 9 and 17 in Unit 17, although reporting is voluntary (Bogle 2023). ADF&G reported harvest averaged 26 wolverines/year in Unit 17 in recent years, and from 2015-2020, wolverine harvest in Unit 9 averaged 16/year (ADF&G 2022a, 2022b). While an unlimited number of wolverines may be trapped, the chronology of wolverine harvest is unknown. Depending on year, wolverine harvest via trapping may be relatively high in March if travel conditions are good.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 35.

Rationale: Adopting this proposal would reduce opportunity to harvest wolverines for federally qualified subsistence users under State regulations, although it would align State and Federal regulations in Units 9 and 17. Conservation concerns are uncertain. While trapping pressure seems low, harvest limits are high

and harvest chronology is unknown. Limited harvest and biological data preclude full evaluation of conservation concerns.

Literature Cited

ADF&G. 2022a. RC4 Tab 3.1 Dillingham Area Overview. Presentation to the Board of Game. Central & Southwest Region Meeting. January 21–29, 2022. Wasilla, AK. Division of Wildlife Conservation.

ADF&G. 2022b. RC4 Tab 4.1 King Salmon Area Overview. Presentation to the Board of Game. Central & Southwest Region Meeting. January 21–29, 2022. Wasilla, AK. Division of Wildlife Conservation.

Bogle, S. E. 2023. 2022 Alaska Trapper Report: 1 July 2022-30 June 2023. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2023-3, Juneau.

PROPOSAL 36 - 5 AAC 85.057 Hunting seasons and bag limits for wolverine.

Shorten the hunting season for wolverine in Unit 17.

Current Federal Regulations:

Unit 17— Wolverine Hunting

1 wolverine	*Sep. 1-Mar. 31.*

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

Impact to Federal subsistence users/wildlife: This proposal would reduce harvest opportunity for federally qualified subsistence users under State regulations. Additionally, adoption of this proposal would misalign closing dates between Federal and State regulations, increasing regulatory complexity and potentially, law enforcement concerns. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Little impact on the wolverine population is expected. While this proposal intends to protect denning females, adoption of this proposal would likely have little impact on the wolverine population in Unit 17. The trapping harvest limit is 'no limit', while the hunting harvest limit is only one, and generally, most wolverines are harvested via trapping versus hunting (Bogle 2023). From 2017-2022, Region IV wolverine harvest from sealing records averaged 141 wolverines per year, accounting for about 31% of the total reported harvest of wolverines statewide. The relative abundance of wolverines in Unit 17 is considered scarce and reported harvest from the 2022 trapper questionnaire was only 17, although reporting is voluntary (Bogle 2023). ADF&G reported wolverine harvest averaged 26/year in Unit 17 (ADF&G 2022).

Federal Position/Recommended Action: The OSM recommendation is **neutral** to Proposal 36.

Rationale: Adopting this proposal decreases opportunity for federally qualified subsistence users. While conservation concerns seem minimal due to low hunting pressure and harvest limits, limited harvest and biological data preclude full evaluation of conservation concerns.

Literature Cited

ADF&G. 2022. RC4 Tab 3.1 Dillingham Area Overview. Presentation to the Board of Game. Central & Southwest Region Meeting. January 21–29, 2022. Wasilla, AK. Division of Wildlife Conservation.

Bogle, S. E. 2023. 2022 Alaska Trapper Report: 1 July 2022-30 June 2023. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2023-3, Juneau.

PROPOSAL 37 - 5 AAC 84.270 Furbearer trapping.

Remove the two per day bag limit for beaver when taken by firearm and allow the use of firearm from October 10 – May 31 in Unit 17.

Current Federal Regulations:

Unit 17—Beaver Trapping

No limit	*Oct. 10-Mar. 31.*
2 beavers per day; only firearms may be used	*Apr. 15-May 31.*

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

Impact to Federal subsistence users/wildlife: This proposal would increase hunting opportunity for federally qualified subsistence users by removing the bag limit and firearm restriction from Apr. 15- May 31 under State trapping regulations. While Federal regulations are already more restrictive than State regulations, this proposal further misaligns them. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

According to ADF&G in their proposal, Unit 17 beaver populations are healthy and there are no conservation concerns. No impacts to the beaver population are expected. This is a housekeeping proposal as State hunting regulations for beaver are year-round with no limit, so restricting users with a trapping license to only two beavers by firearm from Apr. 15-May 31 is unnecessary.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 37.

Rationale: This proposal would increase opportunity for federally qualified subsistence users under State trapping regulations, simplify State regulations and there are no conservation concerns.

PROPOSAL 43 – 5 AAC 85.045. Hunting seasons and bag limits for moose.
Establish an antlerless moose season in Unit 13A.

Current Federal Regulations:

Unit 13—Moose

Unit 13E—1 antlered bull moose by Federal registration permit only; only 1 permit will be issued per household	*Aug. 1–Sep. 20*
Unit 13, remainder—1 antlered bull moose by Federal registration permit only	*Aug. 1–Sep. 20*

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

Impact to Federal subsistence users/wildlife: Establishing an antlerless moose season for Unit 13A would increase opportunity for federally qualified subsistence users when the hunt is offered. However, opportunity for harvest would be limited as this would be a drawing hunt with a limited number of permits. This antlerless hunt was not reauthorized by local Advisory Committees in 2024.

ADF&G is authorized to allow the harvest of up to 1% of the cow population when the subunit population is at or above the midway point of the management objective of 3,500–4,200. The 2023 population estimate for Unit 13A is 3,745 moose (Hatcher 2024, pers. comm.), which is just below that midpoint. The hunt is also closely managed through the number of available drawing permits, which changes as the population changes, ensuring sustainable harvests.

The moose population declined in 2021–2022 due to record snowfall in Unit 13. Harvest has been reported as stable at lower levels since 2018. Since the closure of Unit 13 caribou hunting starting in 2023, fewer hunters have participated in the Unit 13 moose hunt (ADF&G 2024). Allowing antlerless harvest can positively impact the moose population by providing managers tools to keep populations within objectives and prevent populations from exceeding the carrying capacity of the habitat. According to harvest data ADF&G provided in their proposal, cow harvest has been very low and consistently below 1% of the estimated moose population, indicating no conservation concerns.

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

Rationale: Re-establishing the antlerless moose season would increase harvest opportunity for federally qualified subsistence users hunting under State regulations. As draw permit numbers are adjusted annually to account for current population metrics, reauthorizing the antlerless seasons would pose no threat to conservation by overharvest, but could help keep the population within sustainable levels.

Literature Cited

ADF&G. 2024. Annual report to the Alaska Board of Game on Intensive Management for moose with wolf predation control in Unit 13. Division of Wildlife Conservation.

Hatcher, H. 2024. Wildlife biologist. Personal communication: email. ADF&G. Glennallen, AK.

PROPOSAL 44 – 5 AAC 85.045. Hunting seasons and bag limits for moose.
Establish an antlerless moose season in Unit 13C.

Current Federal Regulations:

Unit 13—Moose

Unit 13E—1 antlered bull moose by Federal registration permit only; only 1 permit will be issued per household	*Aug. 1–Sep. 20*
Unit 13, remainder—1 antlered bull moose by Federal registration permit only	*Aug. 1–Sep. 20*

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

Impact to Federal subsistence users/wildlife: Establishing an antlerless moose season for Unit 13C would increase opportunity for federally qualified subsistence users when the hunt is offered. However, opportunity for harvest would be limited as this would be a drawing hunt with a limited number of permits.

ADF&G has established the Unit 13C management objective as 2,000–3,000 moose, with a harvest objective of 155–350. The 2023 population estimate for Unit 13C is 2,530 moose (Hatcher 2024, pers. comm.), which is within the objective. Also, population composition metrics are dropping as the 2023 calf:cow ratio was 10:100, which is below the objective of 30:100. This may indicate nutritional stress as the moose population may have reached carrying capacity.

The antlerless hunt will be closely managed through the number of available drawing permits, which changes as the population changes, ensuring sustainable harvests. Harvest has been reported as stable at lower levels since 2018. Since the closure of Unit 13 caribou hunting starting in 2023, fewer moose hunters are on the landscape (ADF&G 2024). Allowing antlerless harvest can positively impact the moose population by providing managers tools to keep populations within objectives and prevent populations from exceeding the carrying capacity of the habitat.

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

Rationale: Establishing this antlerless moose season would increase harvest opportunity for federally qualified subsistence users hunting under State regulations. As draw permit numbers are adjusted annually to account for current population metrics, reauthorizing the antlerless seasons would pose no threat to conservation by overharvest, but could help keep the population within sustainable levels.

Literature Cited
ADF&G. 2024. Annual report to the Alaska Board of Game on Intensive Management for moose with wolf predation control in Unit 13. Division of Wildlife Conservation. Hatcher, H. 2024. Wildlife biologist. Personal communication: email. ADF&G. Glennallen, AK.

Hatcher, H. 2024. Wildlife biologist. Personal communication: email. ADF&G. Glennallen, AK.

PROPOSAL 45 – 5 AAC 85.045. Hunting seasons and bag limits for moose.
Add a five-day archery only season for hunting moose in Unit 13.

Current Federal Regulations:

Unit 13—Moose

Unit 13E—1 antlered bull moose by Federal registration permit only; only 1 permit will be issued per household	*Aug. 1–Sep. 20*
Unit 13, remainder—1 antlered bull moose by Federal registration permit only	*Aug. 1–Sep. 20*

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

Impact to Federal subsistence users/wildlife: This proposal would marginally increase opportunity for federally qualified subsistence users hunting under State regulations, although archery is a seldom used subsistence method due to its inefficiency. However, federally qualified subsistence users may already harvest moose on Federal public lands under Federal regulations with firearms during the proposed archery-only State season. The State community hunt is also open during this proposed archery-only season. Regulatory complexity and law enforcement concerns as well as competition for federally qualified subsistence users may increase if this proposal is adopted. Importantly, safety concerns may increase as archery hunters would need to be aware that firearm hunts are also occurring.

Any additional harvest from an archery-only season would likely be low and not expected to affect the moose population in Unit 13. Harvest in 2022 was mostly below harvest objectives (ADF&G 2024).

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

Rationale: Adding this archery-only moose season to Unit 13 would not substantially benefit federally qualified subsistence users. The additional harvest may not affect moose populations, but regulatory complexity and law enforcement concerns may increase. Importantly, if this proposal is adopted, archery hunters should be aware other hunters are using firearms during the archery-only general season.

Literature Cited
ADF&G. 2024. Annual report to the Alaska Board of Game on Intensive Management for moose with wolf predation control in Unit 13. Division of Wildlife Conservation.

PROPOSAL 49 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.
Eliminate the harvest of Nelchina caribou.

Current Federal Regulations:

Unit 11—Caribou

Unit 11–1 bull by Federal registration permit	*May be announced.*

Unit 12—Caribou

Unit 12, that portion within the Wrangell-St. Elias National Park and Preserve that lies west of the Nabesna River and the Nabesna Glacier. All hunting of caribou is prohibited on Federal public lands	*No open season.*
Unit 12, that portion east of the Nabesna River and the Nabesna Glacier and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border—1 bull by Federal registration permit only *Federal public lands are closed to the harvest of caribou except by federally qualified subsistence users hunting under these regulations*	*Aug. 10–Sep. 30.*
Unit 12, remainder—1 bull	*Sep. 1–20.*
Unit 12, remainder—1 caribou may be taken by a Federal registration permit during a winter season to be announced. Dates for a winter season to occur between Oct. 1 and Apr. 30, and sex of the animals to be taken will be announced by the Tetlin National Wildlife Refuge Manager in consultation with the Wrangell-St. Elias National Park and Preserve Superintendent, Alaska Department of Fish and Game area biologists, and Chairs of the Eastern Interior Regional Advisory Council and Upper Tanana/Fortymile Fish and Game Advisory Committee	*Winter season to be announced.*

Unit 13—Caribou

Units 13A and 13B—up to 2 caribou by Federal registration permit only	*Aug. 1–Sep. 30* *Oct. 21–Mar. 31*
Unit 13, remainder—2 bulls by Federal registration permit only	*Aug. 1–Sep. 30* *Oct. 21–Mar. 31*

Unit 14B—Caribou

No open season.

Unit 20E—Caribou

Unit 20E—up to 3 caribou, to be announced, by a joint State/Federal registration permit	*Fall season between Aug. 1 and Sep. 30, to be announced. Winter season between Oct. 21 and Mar. 31, to be announced.*

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Federal Subsistence Board has closed all hunts on the Nelchina caribou herd via special action since 2023. The Board will also consider WP25-01, an out-of-cycle wildlife proposal requesting changing all Nelchina caribou herd (NCH) hunts in Units 11, 12 remainder, and 13 to may be announced seasons, delegating authority to Federal in-season managers to manage the NCH hunts, and conducting an Alaska National Interest Lands Conservation Act (ANILCA) §804 user prioritization analysis for the NCH during its February 2025 regulatory meeting.

Impact to Federal subsistence users/wildlife: Eliminating harvest on the NCH would reduce opportunity for federally qualified subsistence users hunting under State regulations. As Nelchina caribou are a very important subsistence resource in the region, this would substantially negatively impact federally qualified subsistence users. However, given the severe decline of the NCH, closing hunts now will help ensure opportunity for the future.

Currently all Federal and State hunts on the NCH are closed due to conservation concerns. If WP25-01 is adopted, all Federal NCH hunts would become may-be-announced seasons and harvest would be restricted on Federal public lands to a subset of federally qualified subsistence users and closed to hunting under State regulations. This proposal could positively impact the NCH and promote its recovery by eliminating harvest mortality, but allowing harvest if the NCH recovers within objective levels. However, as ADF&G has closed all the NCH hunts under State regulations in recent years, OSM expects they would continue to do so until the herd sufficiently recovers to allow sustainable harvest.

Federal subsistence harvest of Nelchina caribou is a relatively small and limited portion of total harvest. Limiting factors include the small amount of Federal public lands within the herd's range (13% of Unit 13) and the timing of the migration of the NCH across the accessible Federal public lands. Therefore, most federally qualified subsistence users harvest caribou under State regulations. Closing all hunts for a set amount of time may restrict federally qualified subsistence users' opportunity to harvest needed resources. While the proponent provides a population threshold to re-open the hunt if met, OSM encourages ADF&G and the BOG to consider adjusting that threshold to provide limited hunting opportunity sooner through a tiered hunt structure, so federally qualified subsistence users' opportunity is not restricted longer than necessary.

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

Rationale: Due to the dramatic decline in NCH abundance and severe conservation concerns, all Federal and State hunts have been closed for several years. State and Federal managers are protecting the NCH and will only open the hunt when the NCH has sufficiently recovered to provide for sustainable harvests. Therefore, a moratorium may be unnecessary as the NCH is already adequately protected.

However, a moratorium provides certainty to hunters that the hunt will remain closed and messages that managers and the Board are focused on herd recovery (BOG 2024). If a harvestable surplus does become available, an emergency petition could be submitted to open the hunt and provide subsistence opportunity (BOG 2024). While a population threshold provides an option to re-open hunts before the scheduled moratorium end-date, OSM recommends re-opening incrementally rather than taking an "all or nothing" approach.

Literature Cited

ADF&G. 2023. RC4 Tab 7.1 Proposals for Other Regions excluding Reauthorizations. Presentation to the Board of Game. Southcentral Region Meeting. March 17–22, 2023. Soldotna, AK. Division of Wildlife Conservation.

BOG. 2024. Recording of the Western Arctic/Western Region Alaska Board of Game Meeting, January 26-29, 2024. https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2023-2024/waw/index.html?mediaBasePath=/Meeting%2001-28-24%20%282%29%20%28Jan-28-24%206-08-56%20PM%29. Recording of the January 28, 2024, meeting. Kotzebue, Alaska.

PROPOSAL 52 – 5 AAC 92.530. Management areas. 5 AAC 85.055. Hunting seasons and bag limits for sheep.

Create a new management area around MacColl Ridge in Unit 11, open to resident sheep hunting by registration permit only.

Note: OSM's comment only applies to the registration permit portion of this proposal. OSM has no position on the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 11—Sheep

1 ram	*Aug. 10–Sep. 20*
1 sheep by Federal registration permit only by persons 60 years of age or older. Ewes accompanied by lambs or lambs may not be taken	*Aug. 1–Oct. 20*

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users currently may harvest any ram during the existing Federal season, which mirrors the State season. Creating a new management (hunt) area under State regulations will not affect that ability. If a management area is

created, federally qualified subsistence users hunting on MacColl Ridge under State regulations will need to obtain a registration permit, rather than the harvest ticket currently required. If there is no limit to the number of permits available, there will be no appreciable difference for federally qualified subsistence users, other than slightly increasing their administrative burden by requiring a registration permit and associated harvest report. However, they could still hunt by harvest ticket under Federal subsistence regulations. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

Requiring a registration permit is not expected to directly impact the sheep population, although it would improve harvest reporting, which could allow for more informed management of the sheep population.

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

Rationale: Requiring a registration permit would increase the administrative burden for federally qualified subsistence users but would improve harvest reporting. However, federally qualified subsistence users could still hunt by harvest ticket on Federal public lands under Federal subsistence regulations. Overall, creating a management area will not reduce rural Alaskans' ability to harvest sheep on MacColl Ridge.

PROPOSAL 56 – 5 AAC 85.040. Hunting seasons and bag limits for goat.
Establish an archery only registration goat hunt in Units 13D and 11.

Note: OSM's comments only apply to the Unit 11 portion of this proposal.

Current Federal Regulations:

Unit 11—Goat

Unit 11, that portion within the Wrangell-St. Elias National Park and Preserve that is bounded by the Chitina and Nizina rivers on the south, the Kennicott River and glacier on the southeast, and the Root Glacier on the east—1 goat by Federal registration permit only	*Aug. 25-Dec. 31.*
Unit 11, the remainder of the Wrangell-St. Elias National Park and Preserve—1 goat by Federal registration permit only	*Aug. 10-Dec. 31.*
Unit 11, that portion outside of the Wrangell-St. Elias National Park and Preserve	*No open season.*

Federal public lands will be closed by announcement of the Superintendent, Wrangell-St. Elias National Park and Preserve, to the harvest of goats when a total of 45 goats has been harvested between Federal and State hunts

Unit 13—Goat

	No Federal open season.

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

Impact to Federal subsistence users/wildlife: This proposal would marginally increase opportunity for federally qualified subsistence users hunting under State regulations, although archery is a seldom used subsistence method due to its inefficiency. However, federally qualified subsistence users may already harvest goats on Federal public lands under Federal regulations with firearms during the proposed archery-only State season. Regulatory complexity and law enforcement concerns as well as competition for federally qualified subsistence users may increase if this proposal is adopted. Importantly, safety concerns may increase as archery hunters would need to be aware that firearm hunts are also occurring.

Any additional harvest from an archery-only season would likely be low and not expected to affect the goat population in Unit 11.

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

Rationale: Adding this archery only season to Unit 11 would not benefit federally qualified subsistence users. The additional season may increase regulatory complexity and law enforcement concerns. Importantly, if this proposal is adopted, archery hunters should be aware Federal subsistence hunters are using firearms during the State's archery-only general season.

PROPOSAL 57 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.
Increase the bag limit for brown bear in Unit 13.

Note: OSM's comments only apply to the Unit 13 remainder portion of this proposal.

Current Federal Regulations:

Unit 13—Brown Bear

Unit 13—Brown Bear: 1 bear.	*Aug. 10-May 31.*
Bears taken within Denali National Park must be sealed within 5 days of harvest. That portion within Denali National Park will be closed by announcement of the Superintendent after 4 bears have been harvested	

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

Impact to Federal subsistence users/wildlife: In Unit 13 remainder, federally qualified subsistence users currently have a shorter season to harvest brown bear under Federal regulations than compared to the State season, which is year-round. Under Federal regulations, only black bear may be harvested over bait in Unit 13, whereas both black and brown bear may be taken over bait under State regulations during the bear baiting season. Adopting this proposal would provide additional harvest opportunity for federally qualified subsistence users under State regulations. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

While there is little current empirical data on the abundance of brown bear in Unit 13, from 2018–2020 harvest was reported as stable with a declining population trend in 2022 (ADF&G 2022). Brown bears are often managed conservatively because they have large home ranges and low reproductive rates (Miller 2011). With the lack of recent population data, there is not enough information to determine if there is a conservation concern with brown bear in Unit 13. This proposal should be considered in conjunction with Proposal 2, which requests opening a fall bear baiting season in Unit 13 as increasing the harvest limit and also adding an additional baiting season could have compounding effects on harvest increases and associated conservation concerns, especially since most bear harvest occurs over bait and much of Unit 13 is road-accessible.

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

Rationale: While this proposal increases opportunity for federally qualified subsistence users, conservation concerns are uncertain. OSM does not have enough biological or harvest information to effectively evaluate whether increasing the brown bear harvest limit in Unit 13 would create conservation concerns. Harvest is reported as stable for the Unit 13 brown bear population. Allowing for additional harvest may not affect the brown bear population.

Literature Cited

ADF&G. 2022. RC4 Tab 5.1 Glennallen Area Overview. Presentation to the Board of Game. Central & Southwest Region Meeting. January 21–29, 2022. Wasilla, AK. Division of Wildlife Conservation.

Miller, S.D., J.W. Schoen, J. Faro, D.R. Klein. 2011. Trends in intensive management of Alaska's grizzly bears, 1980-2010. The Journal of Wildlife Management. 75(6): 1243-1252.

PROPOSAL 59 – 5 AAC 85.270. Furbearer trapping.

Lengthen the wolf trapping season in Unit 11.

Current Federal Regulations:

Unit 11—Wolf Trapping

Wolf: No limit	*Nov. 10-Mar. 31.*

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

Impact to Federal subsistence users/wildlife: In Unit 11, Federal regulations currently match State regulations for season length and harvest limit. Adopting this proposal will misalign Federal and State regulations, increasing regulatory complexity and will allow greater opportunity under State regulations. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

Little impact to the wolf population is expected from adopting this proposal. Local knowledge provided by the proponent (WRST SRC) indicates wolves are abundant in Unit 11. While harvest of wolves in Unit 11 from 2018–2020 averaged only 21 animals/year, this proposal would increase harvest opportunity and therefore, potential harvests (ADF&G 2022). However, 77% of Unit 11 wolf harvest from 2016-2020 occurred from December-February, with only 8% and 1% occurring in March and November, respectively (ADF&G 2022). This suggests extending the trapping season into October and April will result in very few additional harvests. Additionally, most land in Unit 11 is Wrangell-St. Elias National Park (63%), which is closed to anyone trapping under State regulations. This will greatly limit the area open during the extended season if this proposal is adopted, which may in turn limit the number of additional wolves trapped.

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

Rationale: Adopting this proposal would provide additional harvest opportunity for federally qualified subsistence users trapping under State regulations and conservation concerns seem minimal. Local knowledge attests the Unit 11 wolf population is abundant. Additionally, wolf harvest is reported as low for Unit 11 and additional harvest resulting from adoption of this proposal is expected to be low.

Literature Cited

ADF&G. 2022. RC4 Tab 5.1 Glennallen Area Overview. Presentation to the Board of Game. Central & Southwest Region Meeting. January 21–29, 2022. Wasilla, AK. Division of Wildlife Conservation.

PROPOSAL 60 – 5 AAC 85.270. Furbearer trapping.

Lengthen the coyote trapping season in Unit 11.

Current Federal Regulations:

Unit 11—Coyote Trapping

Coyote: No limit	*Nov. 10-Mar. 31.*

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

Impact to Federal subsistence users/wildlife: In Unit 11, Federal regulations currently match State regulations for season length and harvest limit. Adopting this proposal will misalign Federal and State

regulations, increasing regulatory complexity and allowing greater opportunity under State regulations. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

Impacts to the coyote population are unknown. The State does not require sealing of coyote taken under a trapping license, so there is little harvest data available to determine harvest trends or to use as a population index. Trappers responding to the Alaska Trapper Report questionnaire reported no coyotes harvested from Unit 11 in either 2020, 2021, or 2022 and total reported harvest from Region IV is low. From 2020–2022, respondents to the questionnaire considered coyotes scarce in Region IV. Trappers responding to the questionnaire also considered coyotes of median importance in their trapping efforts (Bogle 2021, 2022, 2023). Most land in Unit 11 is Wrangell-St. Elias National Park (63%), which is closed to anyone trapping under State regulations. This will limit the area open during the extended season if this proposal is adopted, which may in turn limit the number of additional coyotes trapped.

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

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users trapping under State regulations. Coyote harvest is reported as very low for Unit 11, and any additional harvest resulting from adoption of this proposal is expected to be low.

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2023-3, Juneau.

Bogle, S. E. 2023. 2022 Alaska trapper report: 1 July 2022–30 June 2023. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2023-3, Juneau.

PROPOSAL 61 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Change the start date for the ptarmigan hunting season in Unit 13B.

Current Federal Regulations:

Unit 13—Ptarmigan

Ptarmigan (rock, willow, and white-tailed): 20 per day, 40 in possession Aug. 10-Mar. 31.

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

Impact to Federal subsistence users/wildlife: In Unit 13B, Federal regulations currently allow a longer season and a higher harvest limit than State regulations. Adopting this proposal will not affect federally

qualified subsistence users' ability to harvest ptarmigan on Federal public lands. Adopting this proposal will however reduce Federal users' opportunity to harvest under State regulations.

Willow ptarmigan numbers in the Alaska Range have overall decreased since a 2018 regulation change, which lengthened the State season from November 30 to February 15 (ADF&G 2022). While rainy summers are believed to be causing reduced breeding success, additive mortality in the form of extra harvest from a longer season has taken more ptarmigan out of the breeding population (ADF&G 2022). The 2024 spring breeding survey for willow ptarmigan along the Eastern Denali Highway in Unit 13B resulted in an average of 1.4 males per stop, which is slightly above the recent 5-year average of 1.2 males per stop (ADF&G 2024).

This season change, if adopted, may not increase the number of ptarmigan on the landscape, only allow the youngest to grow to a greater size before being harvested. Most of this early season harvest may be considered compensatory mortality as some/most of those harvested may not have lived through the winter (Merizon et al. 2018). Harvest of ptarmigan in Unit 13 is not well documented, as small game hunting has no reporting requirement.

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

Rationale: Adopting this proposal would not lead to greater numbers of ptarmigan in Unit 13B. Harvesting ptarmigan early in the season is typically compensatory mortality, whereas harvesting them at the end of the season would be additive mortality. This proposal would not likely affect the overall ptarmigan population and would restrict federally qualified subsistence users' opportunity to harvest ptarmigan under State regulations.

Literature Cited

ADF&G. 2022. RC4 Tab 5.2 Glennallen Area Proposals. Presentation to the Board of Game. Central & Southwest Region Meeting. January 21–29, 2022. Wasilla, AK. Division of Wildlife Conservation.

ADF&G. 2024. Alaska Small Game Summary 2024. Alaska Department of Fish and Game. Division of Wildlife Conservation.

Merizon, R. A., J. P. Skinner, and M. O. Spathelf. 2018. Movement, survival, and nest monitoring of rock ptarmigan in Game Management Unit 13B, 2013–2017. Alaska Department of Fish and Game, Final Wildlife Research Report ADF&G/DWC/WRR2018-1, Juneau.

PROPOSAL 62 – 5 AAC 85.065. Hunting seasons and bag limits for small game.
Extend the spring hunting season for ptarmigan in Units 13A, 13C and 13D.

Current Federal Regulations:

Unit 13—Ptarmigan

Ptarmigan (rock, willow, and white-tailed): 20 per day, 40 in possession Aug. 10-Mar. 31.

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

Impact to Federal subsistence users/wildlife: In Units 13A, 13C, and 13D, Federal regulations currently allow a higher harvest limit than State regulations. Adopting this proposal will not affect federally qualified subsistence users' opportunity to harvest ptarmigan on Federal public lands. Adopting this proposal will however expand federal users' opportunity to harvest ptarmigan under State regulations. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

Willow ptarmigan numbers in the Alaska Range have overall decreased since a 2018 regulation change which lengthened the season in Units 13B and 13E from November 30 to February 15 (ADF&G 2022). While rainy summers are believed to be causing reduced breeding success, additive mortality in the form of extra harvest from a season extending later into winter has taken more ptarmigan out of the breeding population (ADF&G 2024). In 2024, hunters are expected to encounter fewer ptarmigan in the Southcentral area, which includes Units 13A and 13D (ADF&G 2024).

Most early season harvest is considered compensatory mortality as some/most of the birds harvested may not have lived through the winter. Late winter harvest, however, is considered additive mortality, as ptarmigan harvested during the months of March and April may have been in the breeding population (Merizon et al. 2018). This season extension, were it to be adopted, may reduce the number of ptarmigan on the landscape, leading to less breeding success and fewer ptarmigan in the future. Limiting the daily harvest limit will not offset the effect of harvesting breeding ptarmigan. Most ptarmigan hunters harvest 2 birds or less per day on average (ADF&G 2022), although Unit 13 ptarmigan harvest is not well documented, as small game hunting has no reporting requirement.

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

Rationale: Adopting this proposal could create conservation concerns by allowing for unsustainable harvests of breeding class ptarmigan and may lead to lower ptarmigan abundance. Harvesting ptarmigan at the end of the season would be additive mortality.

Literature Cited

ADF&G. 2022. RC4 Tab 5.2 Glennallen Area Proposals. Presentation to the Board of Game. Central & Southwest Region Meeting. January 21–29, 2022. Wasilla, AK. Division of Wildlife Conservation.

ADF&G. 2024. Alaska Small Game Summary 2024. Alaska Department of Fish and Game. Division of Wildlife Conservation.

Merizon, R. A., J. P. Skinner, and M. O. Spathelf. 2018. Movement, survival, and nest monitoring of rock ptarmigan in Game Management Unit 13B, 2013–2017. Alaska Department of Fish and Game, Final Wildlife Research Report ADF&G/DWC/WRR2018-1, Juneau.

PROPOSAL 63 – 5 AAC 85.065. Hunting seasons and bag limits for small game.
Require a registration permit to hunt ptarmigan in Units 13B and 13E.

Current Federal Regulations:

Unit 13—Ptarmigan

Ptarmigan (rock, willow, and white-tailed): 20 per day, 40 in possession Aug. 10-Mar. 31.

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

Impact to Federal subsistence users/wildlife: In Unit 13, Federal harvest of ptarmigan currently occurs with a hunting license from the State of Alaska. Adopting this proposal will not affect federally qualified subsistence users' ability to harvest ptarmigan on Federal public lands. Adopting this proposal would require federally qualified subsistence users to obtain a registration permit to harvest ptarmigan under State regulations, increasing their administrative burden. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025 to also require a registration permit under Federal regulations.

This proposal, if adopted, would increase harvest reporting of ptarmigan in Units 13B and 13E. This information would allow ADF&G to make more informed management decisions. This is especially important in an area like Unit 13B, which experiences heavy hunting pressure from a high number of hunters harvesting ptarmigan. While this proposal would not directly impact the ptarmigan population, it may benefit in the long run through more informed management.

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

Rationale: Adopting this proposal would supply needed harvest data to ADF&G. This data would allow for more informed management decisions regarding the harvest of ptarmigan.

PROPOSAL 69 - 5 AAC 85.045. Hunting seasons and bag limits for moose.
Shorten the season for the Tier II moose hunt in Unit 16B.

Current Federal Regulations:

Unit 16B—Moose

Unit 16B, Redoubt Bay Drainages south and west of, and including the Kustatan River drainage—1 bull	*Sep. 1-15.*
Unit 16B, Denali National Preserve only—1 bull by Federal registration permit. One Federal registration permit for moose issued per household	*Sep. 1-30.* *Dec. 1-Feb. 28.*
Unit 16B, remainder—1 bull	*Sep. 1-30.* *Dec. 1-Feb. 28.*

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

Impact to Federal subsistence users/wildlife: This proposal would decrease hunting opportunity for federally qualified subsistence users under State Tier II regulations during the winter season. Tier II permits were issued beginning in 1990 to ensure local residents have an opportunity to meet subsistence needs (Peltier 2017).

This proposal is not expected to substantially impact the Unit 16B moose population, which is closely managed through a complicated hunt structure based on the harvestable surplus. Moose harvest in Unit 16B has remained below the management objective of an annual harvest of 310–600 moose (Peltier 2017). Adopting this proposal would align the winter closing date for State and Federal regulations, reducing regulatory complexity.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 69.

Rationale: This proposal would decrease hunting opportunity for federally qualified subsistence users under State Tier II regulations. Adoption of this proposal would align the winter closing date for State and Federal regulations. However, if winter conditions prevent federally qualified subsistence users from hunting earlier in the season, this proposal would give them less time to harvest a moose.

Literature Cited

Peltier, T. C. 2017. Moose management report and plan, Game Management Units 16A and 16B: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P2017-7, Juneau AK.

PROPOSAL 72 - 5 AAC 85.015. Hunting seasons and bag limits for black bear.
Eliminate the harvest ticket requirement for hunting black bear in Unit 16.

Current Federal Regulations:

Unit 16—Black bear

3 bears *July 1-June 30.*

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

Impact to Federal subsistence users/wildlife: This proposal would decrease the regulatory burden on federally qualified subsistence users by eliminating the harvest ticket requirement for black bear in Unit 16 under both State and Federal regulations. The sealing requirement provides the necessary means for ADF&G to track black bear harvest in Unit 16. It would also allow Defense of Life and Property (DLP) kills to be retained and utilized by users, provided they have a valid hunting license. No impact to the black bear population is expected.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 72.

Rationale: This proposal would reduce regulatory complexity and redundancy, decrease the administrative burden on federally qualified subsistence users, and have no impact on the bear population. The requirement of a harvest ticket for black bears in Unit 16 is an unnecessary requirement since all bears must be sealed within 30 days of harvest.

PROPOSAL 78 – 5 AAC 92.122. Intensive Management Plan VI.
Allow the same day airborne take of wolves in the active, Unit 16 Intensive Management Plan.

See comments for Proposal 33.

PROPOSAL 80 - 5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine.
Require sealing of beaver taken in Unit 16.

Current Federal Regulations:

§100.26(k) Sealing of beaver, lynx, marten, otter, wolf and wolverine

You may not possess or transport from Alaska the untanned skin of a marten taken in Unit 1-5, 7, 13E, or 14-16 or the untanned skin of a beaver, lynx, otter, wolf, or wolverine, whether taken inside or outside the State, unless the skin has been sealed by an authorized representative in accordance with State or Federal regulations.

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

Impact to Federal subsistence users/wildlife: This proposal would increase the reporting burden for federally qualified subsistence users harvesting beaver under State regulations, but would align Federal and State sealing requirements for beaver in Unit 16.

The information gained through sealing may help managers understand the population dynamics of beavers in Unit 16, contributing to beaver conservation. The local AC has expressed concerns about a severe decline in the Unit 16 beaver population.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 80.

Rationale: This proposal would not affect federally qualified subsistence users trapping under Federal regulations. However, this proposal would increase the reporting burden for federally qualified subsistence users harvesting under State regulations. OSM agrees with the local AC that a severe and prolonged decline observed by local users may warrant a temporary three-year action to gather data in order to obtain a more informed assessment of the beaver population in Unit 16.

PROPOSAL 83 – 5 AAC 85.065. Hunting seasons and bag limits for small game.
Extend the spring hunting season for ptarmigan in Unit 16.

Current Federal Regulations:

Unit 16—Ptarmigan

Ptarmigan (rock, willow, and white-tailed): 20 per day, 40 in possession Aug. 10-Mar. 31.

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

Impact to Federal subsistence users/wildlife: In Unit 16, Federal and State ptarmigan seasons are aligned, but Federal regulations allow a higher harvest limit. Adopting this proposal would increase federally qualified subsistence users' opportunity to harvest ptarmigan under State regulations. It would also misalign State and Federal seasons, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

Extending ptarmigan seasons into April and allowing harvest just prior to breeding is considered additive mortality and will allow more breeding class ptarmigan to be harvested (ADF&G 2022). This harvest could affect the future abundance of ptarmigan on the landscape. Limiting the daily harvest limit will not offset the effect of harvesting breeding ptarmigan. Most hunters taking ptarmigan on average harvest 2 birds or less per day (ADF&G 2022).

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

Rationale: Adopting this proposal would allow for unsustainable harvest of breeding class ptarmigan and may lead to lower ptarmigan abundance. Harvesting ptarmigan at the end of the season would be additive mortality.

Literature Cited

ADF&G. 2022. RC4 Tab 5.2 Glennallen Area Proposals. Presentation to the Board of Game. Central & Southwest Region Meeting. January 21–29, 2022. Wasilla, AK. Division of Wildlife Conservation.

PC219

Name: Kristin Olson

Community of Residence: Long Beach, CA

Comment:

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

PC220

Name: Hayley Oswald

Community of Residence: Colorado

Comment:

Hello, I am writing to express my strong opposition to Proposal 75. Should this move forward, the important balance of the ecosystem would be significantly and irrevocably damaged. It would be a devastating blow to those who passionately protect and love the wildlife that use this land if these species would be subjected to such high levels of hunting. I do not feel the Proposal has made a clear case as to why this change to Unit 16 Intensive Management Plan is warranted nor do they demonstrate how this would have a positive impact in any regard. ADF&G should not pass this proposal.

I would like to also express my support of Proposal 11.

PC221

Name: Oleg Palko

Community of Residence: Wasilla

Comment:

I Oleg Palko support proposal 3

I Oleg Palko also support proposal 70

PC222

Name: Rori Partridge

Community of Residence: Palmer

Comment:

I am commenting to oppose on proposal 82. 50 yard setback for traps is fine when people follow the rule. In the past two weeks I have had two separate dogs get caught in 2 separate leg traps hiking on the ski/bike/walking/snow machine trails in the Moose Range area heading into Hatcher Pass. Both were a traumatic experience. I start my hike off Hatchers Landing road and the traps were both within about a half mile of the actual road (trail head for lack of better word) but both traps were set very close to the public trail. Both baited traps, that were in different locations were about 20 feet or less off the trail. They could have caught any well-behaved domestic animal or even child. I have been hiking here for the last 7 years and have not had an issue. This particular trapper is not being ethical or safe- the trap is not 50 yards off the trail. I also worry that if someone thinks it is okay to place a trap where this person did, then how does he, or she treat the animals that he, or she traps. It is lazy and strictly for convenience. I understand trapping and why people do it, but I do not support it being permitted in highly used public places. It makes a beautiful and safe place become unusable without fear and worry. I already have stopped hiking on Goldmint Trail in Hatchers because it was unsafe for me any my dogs and now after this, I fear I cannot hike here anymore either. Thank you for your time.

PC223

Name: Laramy Paulson

Community of Residence: Talkeetna

Comment:

I'm against proposal 81 for many reasons. For starters Alaska doesn't have check times because the weather doesn't always allow you to get out there and check especially when it snows feet overnight and you have to go to work which would put trapper's in a potentially dangerous situation. Next animals generally move out of an area if there's too much human presence which 36 hours definitely is too much. And lastly the proposal says it's inhumane to leave a animal in a trap and suffer but if it's farther than two miles off a maintained road it's ok, sounds like someone wants to stop trapping in said area.

I'm against proposal 131 which requires trap identification tags. I grew up in Wisconsin and there we had trap tags and if someone was going to do something illegal they would either not put a ID tag on the trap or they would steal someone else's trap and make a illegal set which now is incriminating a innocent person. Not only that but it's illegal to tamper with anyone's traps except a wildlife trooper and I am a trapper and surely don't want a trooper destroying all my sets looking for some foolish trap tag. The only thing it's doing is making it harder on trapper's to try to get less trapping as a whole.

PC224

Name: Elizabeth Payne

Community of Residence: Salem, OR

Comment:

Prop 75 - I don't understand why this is even being considered. Studies have shown time after time that eradicating predators is bad for the prey animals and bad for the ecological balance. In the case of Alaska, which derives so much revenue from the tourism industry, you are shooting yourselves in the foot. Yes, maybe you could attract more hunters, but why go through the expense and difficulty of culling wolves and bears to give a few people a little more game to hunt when you could just do nothing and take the revenue gains from being a premier wildlife viewing destination? Hunting holds a firm place in Alaska's culture and no one is looking to change that, but this is just ridiculous.

Prop 11- I support this for the same reason I am against prop 75 (above).

PC225

Name: Eika Petermann

Community of Residence: Olympia, WA

Comment:

Prop. 11: Support shortened hunting season on bears. It seems the original season supports bears and their natural behavior better.

Prop. 29: Support a review of the viability of MCH. It makes sense to support all forms of naturally occurring wildlife before artificially managing them for human benefit.

Prop. 75: Oppose aerial hunting. Not fair chase. Abhorrent practice.

Prop. 82: Support trapping setbacks. Easy to install and seem to have been successful.

Thank you.

PC226

Name: Nicholas Peters

Community of Residence: Eagle River

Comment:

I am an avid trapper the majority of my life and proposal 81 is a direct attack against tried and true methods and means for trapping and furbearer management in Alaska. Alaska game populations are thinly dispersed with wide home-ranges. Setting minimum track check requirements is not only an attempt by vehement anti-hunting/trapping/fishing individuals to abolish trapping but also poses a major safety concern to trappers who will be legally obligated to push inclement weather and unsafe conditions on foot, snowmachine, fourwheeler, or aircraft to attempt to check traps.

PC227

Name: Anja Phenix

Community of Residence: Healy, AK

Comment:

As an Alaskan, I very strongly oppose Proposal 75. Gunning down bears and wolves from airplanes will not solve moose population decline, it will only further disrupt the balance of our ecosystems. I support Proposals 29, 11 and 82 for their role in protecting bears, wolves and the safety of our public lands.

PC228

Name: Cabot Pitts

Community of Residence: Palmer, Alaska

Comment:

BOG Comments

Referencing Opposition for proposal 11 for shortening the hunting season dates for Brown Bear in Unit 9C for resident and nonresident hunters. Opposition for proposal 18 for shortening the hunting season and creating a draw system in 9C specifically the Katmai Preserve for resident and nonresident hunters.

I am currently one of two outfitters that hold an exclusive outfitting concession permit with the National Park Service(NPS) to offer guided hunts for resident and nonresident hunters within the boundaries of the Katmai preserve. I have held this permit for 12 years and can attest in all my years of operating, my outfit has never had any negative interactions or conflicts in the field with any other users groups (fishermen, bear viewers, subsistence users or other hunting parties). As an operator with a concessions permit with the NPS, we have rules set forth in our operating plans that yield very low impact practices, resource management, and shared use with other user groups. Acting as good stewards of the land across all aspects of these principles typically results in the holding of these types of permits for many years.

In my operating permit allotment time within unit 9C of the Katmai Preserve from 2013-2018, we had the longer season dates of May 10-31 on even years and October 1-21 odd years. My observations during those years were that the fish runs were at increasing record levels in Bristol Bay especially the Allagnek River drainage that flows out of the Katmai Preserve. This resulted in higher bear activity in the area because of the increased number of salmon spawning in the upper tributaries of the Katmai Preserve. Other user groups that focused on bear viewing and sport fishing saw this as an extra opportunity for revenue and started to increase and lengthen their operating seasons into earlier parts of the spring and into later parts of the fall, which overlapped with the hunting seasons at that time. Note that we typically never saw nor had this type of non-hunting use during the open hunting seasons in 9C. The growing demand and high prices accrued from sport fishing and bear viewing has pushed a greed for operating into not so ideal times of the year and results in a overlap with hunters. One of the main reasons the Preserve has been so popular for these bear viewing and sport fish operations is it tends to be a lot closer of a flight to prime salmon streams, which results in lower overhead cost and a higher profit margin, instead of offering a further flight into the Katmai Park where no hunting is allowed. At certain times of the year in some areas of the Katmai Preserve, there can be upwards of 6-8 Beavers (that hold 4-5 people per plane) in one location waiting to pick up sport fishermen and bear viewers. This creates user conflicts between sport fishermen and bear viewers, not hunting parties.

The hunting season dates were shortened in 2019 by a vote from the Board by grouping 9C in with the shorter season dates of 9D and 9E (May 10-25 even years and October 7-21 on odd years). With the Katmai Preserve being located on the north side of 9C, these dates did not fair well with the typical late snow melts in May and early onset of winter and freezing conditions in early October. This resulted in very hard hunting and a compacted season for resident and nonresident hunters alike.

I personally worked with the past unit 9 biologist to look at the statistical harvest data (less than 1% of bear population in unit 9C) and to consider the harder weather phenomenon to support a proposal of the longer dates of May 10-31 on even years and October 1-21 odd years. The Board voted in favor of these longer seasons in the last cycle. Now with these original longer hunting season dates, 9C still struggles with late spring melts and early freezing conditions in early October because of its location on the upper part of the Alaskan Peninsula.

With the data presented from the Department in their opposing comments for Proposal 11 and 18. The hunt-able area of 9C contributes to only 27.2%. The brown bears harvested from the Katmai preserve make up only 16.6% of the bear harvest of 9C; and in total the harvest rate in 9C is less than 1% of the entire estimated bear population of 9C because of the huge area closed to hunting in the Katmai Park. With no biological concern and such a small hunt-able area with a harvest level of less than 1%, I fully oppose proposal 11 and 18.

In reference to the comments in proposal 11 on habituated bears, user conflict and public safety, it is all a moot point because there is no biological concern with the current super low harvest of less than 1% in 9C. The over-use of the sport fishing and bear viewing operations in these small concentrated areas of the Katmai Preserve is grotesque. With the already increased level of use by this user group and the fact that they would push for a shorter season on hunters just because they are not wanting to share with other users on public land should not be tolerated. The high concentrations of bear viewers and sport fishermen over the years has attributed to “habituating” these bears to tolerating fishermen and bear viewers, not hunters. Hunting is allowed on a very regulated basis, open every other year and alternating spring and fall seasons. Therefore giving these non-hunting user groups every other year at an alternating spring and fall season to not have any interactions with any hunters. I have also never had a trophy male boar walk up and present itself to any of my clients because it was used to hunters. This is completely unheard of and not relevant. It should be known and repeated that the guided hunter is focusing on large, old, mature boar bears; not sows or sows with cubs (which are not allowed to be harvested anyway). A slight harvest of mature boars results in a higher successful survival rate of cubs in their first couple years of life, in turn helping the population and more bears on the landscape for everyone to benefit from. Being that the major area of 9C is compromised of the Katmai National Park, there is ample amount of area that is closed to all hunting. This allows other options for non-hunting user groups to extend their already 4 month season from around June 1st through October 10th into other areas outside of the huntable areas of 9C. Again I fully oppose proposal 11 and 18. Thank you for your time for reading my comments.

Sincerely,

Cabot Pitts

Registered Guide 1299

PC229

Name: Sara Poehler

Community of Residence: Oregon

Comment:

Responses to send re bears.docx

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: _____ DATE:_____

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature’s balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

Sara Poehler

1592 Park Avenue NE, Apt 117, Salem, OR 97301

PC230

Name: Jormah Pope

Community of Residence: Delta Junction

Comment:

Proposal 82 won't work as long as dogs are off the leash, they can and will still find traps/ snares even if they are 50 yards off a trail. Dogs are attracted to the same lures/ baits that wild animals are and they can smell it from great distances, some lures ie. Call lures are designed specifically to " call " animals from long distances to the set (trap). This 50 yard setback is a feel good regulation that will ultimately be used to justify the banning of trapping because free roaming dogs will still get caught. Free roaming dogs are the issue not trappers.

PC231

Name: Emily Racenet

Community of Residence: Wasilla, AK

Comment:

I am writing in support of Proposal 82. I would like Proposal 81 to be amended to every 24 hours, in which case I am in support.

PC232

Name: Joan Rankin

Community of Residence: Alaska

Comment:

Proposal 33 – OPPOSE

Killing Wolves is Unnecessary

The concept that state-sanctioned killing of wolves is necessary to control wolf populations is one of the most widespread assumptions in large carnivore management but research demonstrates that wolves limit their own numbers. Wolves don't decimate wild ungulate populations and they don't pose threats to human safety. So why does Alaska continue to get away with outdated and incorrect management practices?

Studies have shown that Alaska's predator control programs, aimed at boosting moose, caribou, and deer populations for hunters, do not effectively increase human moose harvests. Additionally, these programs would have serious and negative impacts on the Denali and Lake Clark ecoystems.

The implementation of such measures not only raises ethical questions but also lacks scientific evidence supporting their effectiveness in increasing prey populations for hunters.

Proposal 59 – OPPOSE

Traps are inhumane and inherently nonselective. They injure and kill countless nontarget animals annually, including endangered and threatened species and even family pets. Traps often injure people too when attempting to release a trapped animal. In their comments, ADFG acknowledges that extending the trapping season poses a risk to non-target species but they support the proposal despite these risks.

Studies have shown that Alaska's predator control programs, aimed at boosting moose, caribou, and deer populations for hunters, do not effectively increase human moose harvests. Additionally, these programs would have serious and negative impacts on the

Denali and Lake Clark ecoystems.

The implementation of such measures not only raises ethical questions but also lacks scientific evidence supporting their effectiveness in increasing prey populations for hunters.

Proposal 75 – OPPOSE

The implementation of such measures not only raises ethical questions but also lacks scientific evidence supporting their effectiveness in increasing prey populations for hunters.

PC233

Name: Migle Rasinskaite

Community of Residence: Wasilla

Comment:

I'd like to oppose proposal 9 regarding population reduction of brown bears in the area by hunting.

Bears are important to the ecosystem and population control happens naturally. Wild bears are mostly herbivores and, if residents exercise appropriate waste control, bears pose no threat to local communities.

PC234

Name: Cory Rausch

Community of Residence: Houston

Comment:

Dear Members of the Alaska Board of Game,

I am writing to strongly oppose Proposal 81, which seeks to impose a 36-hour trap check within a two-mile road system. This proposal, while perhaps well-intentioned, demonstrates a clear disconnect from the realities of trapping in Alaska. Our state's weather is unpredictable, often delivering feet of snow overnight, sometimes continuing for days. Requiring trappers to check traps within a rigid 36-hour timeframe under such conditions is not only impractical, it's outright dangerous.

Furthermore, this proposal is not based on scientific data but rather on feelings and emotions. It lacks any foundation in the actual conditions trappers face or the science that should guide such decisions. It appears to be driven by assumptions rather than evidence or common sense. If this proposal were rooted in sound science, it would take into account the unique challenges Alaska presents, including extreme weather and the physical demands of the terrain. But it does not, and as a result, it poses an unnecessary risk to trappers and undermines the very activity it seeks to regulate.

As a disabled person with collapsed arches in my feet, I know firsthand how physically demanding it is to traverse deep snow, even with snowshoes. During a storm two winters ago, we received three feet of fresh powder, and it took over a week before I could safely access my trapline. Forcing trappers like myself to comply with a 36-hour check during extreme weather is asking us to risk our safety unnecessarily. The physical toll of trudging through miles of fresh snow in harsh conditions would exclude many from trapping altogether, particularly those with physical limitations.

Beyond the dangers to individual trappers, Proposal 81 puts the safety of first responders at risk. If I am required to check traps in a blizzard and become stranded or injured, state troopers and rescue personnel would need to be sent in, endangering their lives as well. Common sense must prevail here: it is neither reasonable nor responsible to expect anyone to go out into hazardous conditions just to adhere to an arbitrary time frame.

I urge the Board to carefully consider the real-life consequences of this proposal. Trapping is an integral part of Alaskan culture, but it must be done safely and based on scientific data, not on emotional or misguided notions. Proposal 81 ignores the realities of Alaska's extreme weather and the physical challenges faced by many trappers. Passing this proposal would be reckless and would endanger lives unnecessarily. I ask the Board to reject Proposal 81 and instead adopt measures that prioritize the safety and well-being of all trappers.

Thank you for your time and consideration.

Sincerely,

Cory Rausch

PC235

Name: Marie Raybaud

Community of Residence: France

Comment:

Opposition with Proposals 2 and 3,

Leave nature and animals as they are

PC236

Name: Ryan Richards, Redoubt Mountain Lodge

Community of Residence: Anchorage

Comment:

Proposal 76 is very unethical. Same day flying and hunting of brown bear eliminates fair chase ethics.

PC237

Name: Josie Reed

Community of Residence: Colorado

Comment:

Dear Alaska Board of Game,

I'm writing to strongly oppose Proposal 75 and to voice my support for Proposal 11. Proposal 75, which would allow aerial gunning of wolves and bears in Unit 16, is distressing and harmful. Reducing wolf populations by up to 80% and bear populations by 60–80% would devastate the ecosystem and hurt Alaska's reputation as a top wildlife tourism destination. Wolves and bears are critical to healthy ecosystems, and the idea of targeting them in this way feels both short-sighted and inhumane.

On the flip side, Proposal 11 is a great step forward. Shortening the brown bear hunting season around Katmai to avoid overlapping with bear-viewing season is just common sense. Bear viewing is one of Alaska's biggest draws, and protecting it benefits wildlife, local communities, and visitors alike.

I urge the Board to reject Proposal 75 and support Proposal 11 for the sake of Alaska's wildlife and sustainable tourism.

Thank you,

Josie Reed

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Resident Hunters of Alaska (RHAK)

Comments to Alaska Board of Game

Region IV Central/Southwest Meeting

January 10-17, 2024

Proposals we support: 2,5,8,12,14,16,28,32,39,41,42,51,52,57,70,71,73,75,77,78,79

Proposals we oppose: 3,4,9,11,13,15,17,18,45,46,47,50,53,54,56,66,67,74,81

Proposal 3 – Allow the use of cellular cameras for taking black and brown bear over bait

OPPOSE

We understand that there is support from hunters and guides, and some of our members, to allow wireless, cellular game cameras at bait stations, but at some point, we have to say no to using this kind of technology unless it is part of an Intensive Management program.

Certainly, real-time information from a bait station would make it easier for hunters to be successful in harvesting a bear, or a particular bear. But once we allow wireless, real-time information to be used for "hunting," we are going down a slippery slope. The board clearly saw that when they outlawed the use of drones for hunting. Real-time pictures or video being sent to the hunter during a hunt crossed an ethical line. Wireless game cameras at bait stations are no different.

And we can't say that because this would only be allowed to hunt bears, not moose or caribou, that it is somehow different. This is "hunting," not predator control. We are not allowing the opportunity to harvest a bear at a bait station because we want to reduce bear numbers to help boost moose and caribou populations.

Hunters have plenty of opportunity to harvest a bear at a bait station, and we already allow non-wireless game cameras to be used for hunting purposes. We don't believe we should cross the ethical line into allowing wireless game cameras and real-time information to be sent to hunters during a hunting season.

Proposals 4, 45,47,53,56,66,67,74 – Archery-Only Hunts

OPPOSE

All of the above proposals ask for special archery-only hunts.

RHAK opposes new special opportunity archery-only hunts unless weapons restrictions are necessary due to proximity to roads, public trails, and in urban areas. Bowhunters have plenty of opportunities already during general season hunts and existing archery-only hunts. We should not use archery-only hunts as a way of reducing harvests for low or declining game populations due to the lower success rates of bowhunters. If there are concerns of overharvests, hunts should be draw or registration hunts with a quota and available to all hunters.

Proposals 9,13,15,17 – Lengthen the spring and/or fall brown bear seasons in Unit 9

OPPOSE

While we support extending the fall season for both residents and nonresidents, ***we strongly oppose taking away the resident-only late-spring brown bear season in Units 9D & E***.

At the 2018 Region IV meeting, RHAK submitted Proposal 132, which spoke to the difficulty resident hunters have in access and opportunity in Unit 9D & E due to guide concessions and competition with guided hunters and asked to create a resident-only brown bear season in Unit 9.

But the Department had conservation concerns (nonresident guided hunters take 80% of the overall harvest and the majority of sows) and the board amended our proposal to shorten both the fall and spring seasons in Unit 9D & E.

The following cycle, RHAK again submitted a proposal for a resident-only brown bear season in Unit 9D &E. expressing the same concerns about access and opportunity, and that resident hunters were never the user group affecting bear conservation and the board should give residents back part of the seasons they took the previous cycle.

The board passed our proposal as amended to create a resident-only late spring season for the RB 370 registration hunt for Units 9D & E, May 25-31. The nonresident spring season in those units remained the same.

Proposals asking to now extend the spring brown bear seasons for nonresidents would take away the resident-only late-spring season, which is the only opportunity residents have to hunt without competition from guides and their clients.

We urge the board to retain this limited resident-only opportunity and oppose extending that last week of May to nonresident opportunity.

Proposal 50 – Change the DS 165 sheep draw permit to a general hunt for residents only

OPPOSE

If sheep populations in this area weren't in decline, we would support this proposal and will in future if/when sheep populations increase. Crowding is definitely a concern if this proposal were to pass, but this area was managed for maximum sheep hunting opportunity in the past, and crowding was not a concern under that management scenario. The board and Department should clarify how this area is to be managed.

Proposal 51 – Establish a resident-only sheep season in Unit 11 (MacColl Ridge)

SUPPORT

There are certain places in the state with isolated sheep populations that should not allow nonresident opportunity. The MacColl Ridge complex is one of those places.

Where we allow unlimited nonresident hunting opportunity, especially in these types of places, guided nonresident hunters end up pushing residents out. These are "our" sheep, they belong to Alaskans under a public-trust doctrine, and Alaskans are supposed to have a clear priority opportunity to hunt them.

At the very least, this area should be draw-only for nonresident sheep hunters with 1 or 2 permits allocated.

Proposal 52 – Create a new sheep management area in Unit 11 (McColl Ridge) for residents only

SUPPORT

See our comments on Proposal 51

Proposal 54 – Change the DS 160 & DS 260 any ram hunts to full curl

OPPOSE

Some hunters believe that it's wrong to have limited any-ram hunts, under the belief that when we take rams under full curl (FC), we are negatively affecting the overall population, as well as taking away opportunity from other hunters to find a legal ram under the FC management hunts. But with these limited any-ram draw hunts in this specific area, neither of those things are happening.

- There are no sheep conservation concerns under the current DS 160/260 any-ram draw hunts. We can sustainably manage sheep under this any-ram hunt.

- A quarter of the rams in this area do not reach FC. As the Department comments state, "*some rams harvested in the area are 9 or 10 years old, but only reach 3/47/8 curl, and it is not uncommon for rams 8 years or older to be less than full curl, with some 8year-olds reaching less than ¾ curl.*"

The Department bases the number of permits for the FC hunts on the minimum number of legal rams counted during summer aerial surveys. In this area, with some rams never reaching FC, we have a low allocation of permits.

For the any-ram hunts in this area, the Department bases the number of permits on the ewe-like:ram ratio and manages conservatively to maintain a certain ratio. Typically, that means more opportunity for hunters. So, if this area reverts to FC only, that may mean less permits and less opportunity.

The DS160 any-ram hunt is wildly popular, with 3,200 applications for the DS 160 any-ram hunt in 2024! That's because most hunters are still looking for a mature ram but appreciate that they don't have to worry about taking a sub-legal sheep.

When limited any-ram hunts in areas like this pose no sheep conservation concerns, help maintain adequate ram:ewe-like population ratios, and offer additional less-stress hunting opportunity to hunters, we see no problem with them.

We oppose changing these any-ram hunts to FC only.

Proposal 73 – Change the draw hunt sheep bag limit in 14A from FC to any-ram

SUPPORT

See our comments on Proposal 54.

RHAK supports a return to the limited any-ram draw hunts for in these areas as they pose no sheep conservation concerns and allow more opportunity to take a mature ram without the stress of having to worry about legality.

As the Department data shows, when this hunt was changed in 2023 from any-ram to FC, the number of permits dropped substantially. In 2022, the last year of the any-ram hunt, there were 48 permits allocated. In 2023, the first year after going to FC-only, the number of permits decreased to 14.

The 14A any-ram hunts were wildly popular, with nearly 10,000 applications in 2022, the last year of the any-ram hunts in this area.

It's been shown that we can sustainably manage sheep under different management scenarios. Again, the any-ram hunt permit allocations are based on the ewe-ram ratio. The FC hunt permit allocation is based on the minimum number of legal rams counted during aerial surveys. It does not hurt the sheep population to take a limited number of rams under FC, nor does it take away from future FC hunting opportunity.

We support a return to the any-ram draw hunts for 14A south and east of the Matanuska River.

Proposal 75 – Add Department removal of wolves, brown bears, and black bears to Unit 16 Intensive Management Plan

SUPPORT

RHAK has been consistent on our position on Intensive Management. We support Intensive Management predator reduction efforts to increase low moose and caribou populations that are grounded in science and efficacy.

Department removal of wolves was not included in the original Unit 16 IM plan, and the public is unable to reduce wolves in sufficient numbers to meet the wolf population objectives. We support Department removal of wolves within the Unit 16 Intensive Management plan.

Thank you to Board members for your service and taking the time to read our comments, and as always, thanks to Board support and Department staff,

Mark Richards
Executive Director Resident Hunters of Alaska (RHAK)

PC239

Name: Michael Robbins

Community of Residence: Manokotak

Comment:

I, Michael Robbins am not in favor of proposals 35 and 36. Wolverine generally den at higher elevations and other areas where most hunters and trappers do not go during the proposed season time that will be eliminated. Most trappers trap where animals are abundant and can easily take more animals. Trapping in better denning areas would not be to a trappers advantage since most animals are not generally in that type of habitat at that time of year.

In this region of Alaska, along with others, we struggle with access to hunt and trap due to weather conditions. Even with a longer season we might not harvest many animals due to access and how long the access is. Case in point: this season we currently have no snow or safe ice so we cannot travel far yet.

For these reasons stated above, I do not support proposals 35 and 36. I also have not personally talked with anyone that does support them.

PC240

Name: Robin Roberts

Community of Residence: Petersburg, AK

Comment:

Robin Roberts:

I strongly oppose Proposals 2 and 3 - bear baiting is unsportsmanlike, and barbaric.

I strongly oppose Proposals 33, 76, and 78 - airborne taking of game is abhorrent and unsportsmanlike. Too many animals would be taken by this method.

And I strongly oppose Proposition 75 - too many animals will be reduced.

Brown bears and wolves, in particular, have great value for tourism - alive and wandering around, not wasted by taking them. We need to offer more opportunities to see these magnificent animals in the wild, to help people learn about conservation and protecting our precious environment.

PC241

Name: Jesse Rogers

Community of Residence: Dillingham

Comment:

TO: ADF&G Board of Game

FROM: Jesse Rogers, Subsistence Hunter (Dillingham)

RE: Support of Proposal 38 (Lengthen the permit dates to access Walrus Island State Game Sanctuary for hunting)

I am a Yupik subsistence hunter, representing myself in support of proposal 38 to lengthen the Round Island walrus hunt by 5 days at an earlier start. I have been fortunate to crew for Twin Hills community walrus hunts at Hagemeister Island and Platinum at Cape Newenham for 8 different hunts the last 5 years.

Round Island is located in Togiak Bay and is one out of seven islands in the Walrus Islands Game Sanctuary administered by the state. Access to Round Island and waters within 3 miles of Round Island requires an access permit by ADF&G (between May 1 – August 15). The QWC (Qayassig Walrus Commission) is a marine mammal co-management Alaska Native Organization representing 9 communities (Aleknagik, Clark's Point, Dillingham, Ekwok, Ekuk, Manokotak, New Stuyahok, Togiak, and Twin Hills). The Round Island cooperative agreement is a co-management partnership with the QWC, ADF&G, USF&W, and the Eskimo Walrus Commission. The QWC agreement allows for an Alaska Native subsistence hunt on Round Island. Each community's tribal council appoints a QWC commissioner who makes up the QWC board for pre-hunt, post-hunt meetings, and to address co-management issues with the Round Island cooperators. The Board of Game sets access dates for the Round Island walrus hunt, other regulations and issues are addressed by Round Island cooperators in the co-management agreement.

Extending the Round Island Walrus hunt from September 10 – October 20 to September 5 to October 20 would increase hunting safety and opportunities for the QWC Round Island hunt. Out of the 20 quota set by the Round Island Cooperators (which includes animals struck and lost), harvest in recent years has been minimal and most years zero. 2024 was the first successful Round Island walrus harvest in 8 years by any hunting crew (Togiak crew) and it has been well over a decade since any Nushagak based crews have harvested. Traditional hunts were done during the colder month of October for preservation before home appliances and freezers. Bristol Bay weather gets very unpredictable during fall time. Round Island QWC walrus hunt is a weather dependent hunt, fall storms and bad weather have kept crews from successfully harvesting walrus. Talking to elders and retired hunters that have hunted Round Island in the past, fall storms have gotten worse. The longer you wait during fall time to hunt walrus, the more likely the weather window to travel safely to walrus hunt diminishes.

Extending the hunt 5 days earlier would give better harvest opportunities to more desirable walrus hunting haulouts, especially for Togiak Bay communities. Younger Togiak Bay walrus hunting crews recently have been going to Hagemeister Island on the Alaska Maritime National Wildlife Refuge. Hagemeister is not apart of the state game sanctuary and doesn't require a state access permit and QWC hunt permit like Round Island. Participation has been about 1-2 walrus harvests from Togiak Bay each year from Hagemeister. The Hagemeister walrus haul out is located on the SSW corner of the island. There are no natural coves on the Hagemeister walrus haul out and there is strong current from the ocean, even on mild days with winds under 10 miles per hour the waves still break 3-4 feet on the beach. Round

Island during good weather has better beach access and more natural coves for anchoring and parking a boat. After weather, costs like fuel are another factor that has been keeping Togiak and Nushagak crews from participating in the Round Island walrus hunt. Round Island is closer distance to Togiak and Twin Hills (34 miles versus 49 miles) than the Hagemeister Island walrus haul out. There is another haul out at Cape Peirce, but speaking with Togiak and Twin Hills hunters it's too far (approximately 67 miles by skiff). Cape Pierce is only semi-sheltered, with the wrong wind the beach gets on-shore waves. The capes and points (such as Tongue Point and Asigyukpak Spit) gets rough fall time. The method of hunting on Hagemeister is to harpoon the walrus in open water. Harpooning walrus is twice the amount of work with pulling up the harpoon line and towing the animals, then pulling up the animal to a beach to butcher versus harvesting them on a beach. Harpooning has a way higher chance of struck and lost, heavy lines under a lot tension have a tendency to snap. Hagemeister Island's beach is sandy versus rocky and gravel beach on Round Island, all the meat and skin would be cleaner on Round island. An earlier QWC hunt date would help mitigate challenging weather patterns and encourage more participation to the traditional hunt at Round Island.

Thank you for your time. If you have any questions, feel free to contact me.

Jesse Rogers

[redacted]

PC242

Name: Liam Rose

Community of Residence: Wasilla

Comment:

I strongly oppose proposal 51 and 52.

This makes no sense to make it a separate area and get rid of non resident hunting.

Submitted by: Thomas Rothe
Community of Residence: Eagle River, AK

T.C Rothe
Comments to Board of Game
Proposal # 23 Central & Southwest

Proposal # 23 recommends changes to season dates and bag limits for fall drawing hunts for emperor geese.

In short, I support both the expansion of dates for the non-resident drawing hunt season and the increase in the number of hunt permits for non-resident hunters. Regarding potential amendments that may arise during the Board meeting, (1) I see no technical or practical reason to restrict non-resident hunting of emperor geese from the standard dates for this zone Sept 1-Dec 16. (2) The number of non-resident permits should be expanded to provide a more reasonable opportunity to take an emperor goose, but the drawing or selection system should be based on an equal opportunity for all applicants and NOT some auction/high bidder criteria.

Relevant factors in considering changes:

1. Consideration of this proposal may be moot because the current emperor goose population spring index (18,800) is below the management threshold of 23,000 (approx. 120,000 total) necessary for sustainable harvest. This means that a total closure has been triggered and federal regulations will not allow any open seasons. Monitoring methods and action thresholds are in accordance with emperor goose management plans (Pacific Flyway Council 2016 and Alaska Migratory Bird Co-management Council 2016), Pacific Flyway Council recommendations and decisions by the Secretary of the Interior.
2. The crux of managing emperor geese for sustainable harvest is that, unlike other species, emperor goose productivity and survival are much lower and variable annually. And effectively, substantial harvest rates slow or prevent notable population rebounds. Since closure of all emperor hunting in 1987, the population has shown modest growth periods, back-slides and an eventual marginal increase above harvest closure levels in 2017. Since then, the estimated population has declined and we are now back at closed seasons. The role of harvest in recent declines is not a mystery and the causes are known.
    - The U.S. migratory bird treaty with Canada was amended in 1997 to establish legal, regulated subsistence harvests for geese and other birds in Alaska. The first set of such regulations was adopted in 2003. These regulations established a list of bird species that could be taken for subsistence uses, regional hunting season dates, required nesting season closures and some regulations for methods and means of hunting and uses of subsistence-taken birds.

- The amended treaty required each country to establish regulations that sustained bird populations through conservation programs—especially those shared between countries—and establishment of meaningful collaborative processes to include all users and stakeholders (e.g., the Flyway Council System and the Alaska Migratory Bird Co-management Council).
- Despite successful creation of cooperative processes and substantially better communications with all stakeholders, the initial 2003 spring and summer hunting regulations for Alaska CONTAINED NO MEASURES TO ESTABLISH HARVEST QUANTITY LIMITS—NOT AT STATE OR REGIONAL LEVELS OR APPLICABLE TO ANY GROUPS OR INDIVIDUAL HUNTERS. This critical gap in harvest regulations precludes any collaborative conservation measures that limit harvest and precludes any specific measure to reduce harvest of emperor geese—or any other bird population that reaches a critical level of risk. Despite years of extensive efforts to find innovative harvest limiting mechanisms acceptable to subsistence hunters and managers (e.g., quotas, thresholds or in-season monitoring ideas), this critical regulatory tool has been rejected, ignored and painted as "non-traditional" such that emperor geese are now the sad poster child of negligence. NOT A MYSTERY, NOT AN UNNECESSARY REMOVAL OF ANYONE'S RIGHTS.
- Since emperor goose seasons were re-opened in 2017, very restrictive fall drawing hunts have resulted in annual harvests of less than 150 emperors. During the same period, spring and summer subsistence harvests (marginally documented) have taken over 3,000 emperors annually with no harvest limits or reliable harvest reporting. In sum, <u>total annual emperor harvest is comprised of >95% unregulated subsistence take and <5% fall sport harvest</u>. It is obvious that necessary closures for all will persist, or at best, be lifted for single years until "the light switch goes off" again.
- If the Board wants to cooperate on a way out of the Emperor Goose Dilemma, I highly recommend: (1) demand that the Commissioner engages with USFWS, Pacific Flyway Council and all user groups to intensely focus on any workable form of quantitative harvest limits for spring and summer subsistence harvests; (2) write to the Alaska Director of USFWS to articulate the conservation and harvest management problems caused by incomplete regulations—the emperor is a clear example, but brant or a sea duck species can easily be next; (3) communicate directly with the USFWS Director and the Secretary of the Interior to simply relay the serious implications of failed emperor goose conservation and degradation of collaborative management.

3. Since 2017, drawing hunts have been offered to permit up to 25 non-residents to take one emperor goose. Since then, annual non-resident emperor harvest from all drawing hunts has been LESS THAN 20 PER YEAR. There is no rationale that non-resident harvest

has any effect compared to harvests of 150 by residents or 3,000 by unregulated subsistence hunters. Proprietary claims of impacts from non-resident hunters are false. More important is the evidence of greed and selfishness by those that want to exclude non-residents. Migratory birds are by nature and intent shared among hunters and viewers from Siberia and Arctic Canada to Mexico and beyond. Critical foundations of our management system include due respect for all users and cultures with which we share bird populations. Respect for other cultures and sharing traditions is also a critical and essential part of waterfowl conservation. Exclusion of non-resident hunters and an inappropriate sense of ownership of bird populations is not only selfish, but counterproductive. There are almost no situations where claiming "our birds" contributes to effective conservation, and there are clear cases where such selfishness by Boards and Commissions is harmful when turf battles deprive non-resident hunters of reasonable opportunity (see history ND vs SD, Dakotas vs everyone, WA vs OR etc.) The bottom line is that restricting non-resident hunters is NOT NECESSARY for conservation or better harvest for locals; nor does it perpetuate the best of hunter ethics and maintain a sense of waterfowling community. Finally, it should not be unnoticed that, for 25 emperors per year, our visiting hunters contribute thousands of dollars to the State's economy, for transportation, lodging, food, guides, taxidermists and fall tourism—with no real cost to our citizens.

I urge you to engage with the ADFG waterfowl biologists who can provide more data and facts to help deliberate on these proposals. If I can provide more data, history or analysis, I am enthused about contributing over 40 years of waterfowl management experience in Alaska.

Thomas C. Rothe
USFWS, ADFG Retired
[redacted]

PC244

Name: Richard Rothstein

Community of Residence: Anchorage

Comment:

As an Alaska resident, I strongly oppose Proposal 75 because it would harm our wildlife and disrupt the natural balance of our ecosystems. I support Proposals 29, 11 and 82 for their role in protecting bears, wolves and the safety of our public lands."

PC245

Name: L Ruiz

Community of Residence: North Pole

Comment:

"As an Alaska resident, I strongly oppose Proposal 75 because it would harm our wildlife and disrupt the natural balance of our ecosystems. I support Proposals 29, 11 and 82 for their role in protecting bears, wolves and the safety of our public lands."

John Rydeen ADF&G Public Comment December 26, 2024

Proposal 11

I would like to oppose proposal 11 and its effort to shorten the bear hunting season in Unit 9C. The huntable area in the 9C is minimal compared to the overall area in the subunit. Hunters are already very restricted in their use of the unit with respect to the 21 day seasons in spring and/or fall, compared to the June-September seasons for other user groups like bear viewing and fishing.

Bear hunting produces far more fewer user days than the other groups. The large number of user days and the large numbers of clients each day that fishing lodges and bear viewing produces, contributes greatly to the habituating of bears to humans.

Hunting is only allowed in the Park & Preserve. Other users can easily go into the Hard Park during the 7 day period in October as discussed, and thus not have any user conflicts with hunters.

There is no data to support making this change.

Proposal 18

I would like to oppose proposal 18 and its effort to shorten the brown bear hunting season and impose a draw in unit 9C.

The huntable area in 9C is minimal compared to the overall area in the unit. Hunters can only hunt in the Preserve while other users, bear viewers and fishermen can utilize all of 9C.

There is no data to support this proposal's claim that the brown bear population is in decline. Therefore there is no data to support making any changes to the brown bear hunting season. There is no need for the bear hunting to move to a draw. Nor is there a need to shorten the already short brown bear hunting season. The bear harvest is already at low numbers in 9C. The huntable area is a fraction of the overall subunit area. Hunting does not make a large enough impact in 9C to warrant these changes.

Proposal 18 claims mature bear sightings of big mature bears have decreased by bear viewers. Big mature bears tend to avoid areas of high pressure for areas more remote. Proposal 18 is also alluding to the notion that hunting brown bears in unit 9C is depleting the brown bear population to a point where the bear viewing industry is negatively affected. There is no data to support this inference. The bear viewing industry has only been growing over the last 10 years.

Community of Residence: Palmer

PC247

Name: Richenda Sandlin-Tymitz

Community of Residence: Eagle River

Comment:

I'm writing to express strong opposition to Proposals 75, 76, and 78. These proposals for same-day aerial slaughter of bear and wolf represent not only a wildly antiquated view of wildlife "management" but will also have a disastrous impact on wildlife tourism through the proposed regions. I am the Marketing Manager for the largest custom Alaska travel packaging company in the state. The land encompassed within Unit 16 offers some of the best, most accessible wildlife viewing for tourists, keeping in mind that the tourism industry was responsible for $5.6 billion in total economic impact to Alaska in previous year. The board's stated role is to conserve and develop Alaska's wildlife resources. You must consider wildlife as a resource beyond animals to kill for sport of food; wildlife is a resource that draws visitors, create jobs, and bring critical non-resource-extraction money to the state. We in the tourism industry promote Alaska's Big 5 Wildlife, critical species living in natural harmony when their populations aren't negatively impacted by state meddling. This type of predator control is shameful, and beyond the unnecessary violence and radical disruption of nature, it is a black stain on the vital tourism industry as well.

PC248

Name: Vicki Santello

Community of Residence: Florida

Comment:

Proposal 75:ADFG would be authorized to kill wolves, brown bears, and black bears with the use of aircraft, including helicopters, to achieve reduction goals. The reduction goals include removing: 73–80% of wolves, 60% of brown bears, and 60–80% of black bears in the area. I oppose proposal 75.

Proposal 82:These trapping setbacks would help keep dogs and people safe from incidental trapping. I support Proposal 82.

Proposal 11:Shortening the brown bear season would prevent further user conflicts and increase public safety, I support Proposal 11

Proposal 29:I support areview of the population and harvest objectives for the MCHwhere caribou herd populations are plummeting. A review could help abate the State's attempts to increase the caribou herd through predator control, which, in the two years that it has run, has killed over 200 bears in the area. I support Proposal 29

PC249

Name: Patrick Schliesing

Community of Residence: Wasilla

Comment:

I support proposal 70 for extending the bear baiting season in Unit 14a and 14b. With how delayed warm weather has been lately in April and May, I often do not see bears until after the season closes.

I also support proposal 13 for allowing the use of cell game cameras while bear baiting. This is more of a hunter safety initiative to me than capturing trophy bear pictures. I would love the opportunity to check to see if a bear is already at my bait station before approaching.

PC250

Name: William Schreck

Community of Residence: Anchorage

Comment:

Dear Members of the Alaska Board of Game,

I am writing to express my strong opposition to Proposals 51 and 52, which seek to establish resident-only hunting on MacColl Ridge in Unit 11. While I fully support the Board's efforts to ensure equitable hunting opportunities for residents and non-residents, I believe these proposals would increase hunter density and decrease the overall hunting experience for both.

Resident hunters currently have unfettered access to MacColl Ridge. Establishing a resident-only registration hunt would advertise and popularize the ridge. As the constituent states, the area supports "a small population of Dall sheep". The population and hunting opportunities have remained in balance under the current regulation schema for decades. Focusing more hunters on the area jeopardizes that balance.

Establishing a registration area of this size would also set a problematic precedent. Special resident-only hunts on ridges and pocket habitat, would undoubtedly impact lodges across Alaska who have invested years tailoring their offerings and operations.

In closing, I urge the Board to reject Proposals 51 and 52. These proposals would not provide the additional opportunity or hunt quality as the constituent asserts. Thank you for your time and consideration.

Sincerely,

William J. Schreck

PC251

Name: Andrea Serna

Community of Residence: San Diego, CA

Comment:

I am commenting on my opposition to Proposal 16. Instead of increasing scientificly managed bear and wolf hunting quotas, which could have directly benefited local economies and brought additional funding to wildlife agencies, the proposal is requesting the ability to ELIMINATE BEARS and WOLVES using random aerial shooting. This is not conversation.

PC252

Name: Bill Sherwonit

Community of Residence: Anchorage, Alaska

Comment:

Proposal 11: Hunting seasons and bag limits for brown bears in Unit 9C

I strongly support this proposal, which would re-establish brown bear hunting seasons to what long existed in Unit 9C, before the BOG lengthened the seasons in 2022. Not only have the lengthened seasons increased conflicts between human groups and created public-safety concerns, they have increased the chance that human-habituated bears would be killed in the areas mentioned in this proposal. I find the rationale of Jennifer Culbertson, who proposed this change, to be right on the mark. It makes good sense to return to long-standing regulations that benefit bears and the people who come to these areas to view the animals, while having minimal impacts on hunting opportunities.

Proposal 29: Establish new (and more reasonable) population objectives for the Mulchatna Caribou Herd

I strongly support this proposal, which requests the Department of Fish and Game to determine a new population "goal" for the Mulchatna Caribou Herd, whose numbers have fluctuated greatly over the past few decades. A strong case can be made that the state's population objective for this herd is unrealistically high and should be reconsidered and revised. Given the stresses that the herd faces—notably disease, changing habitat, diminished food sources—it's unlikely the herd will ever recover to the level state managers have aimed for. A more realistic target will also eliminate the state's unprecedented slaughter of bears in the vicinity of the herd's calving grounds, a highly controversial predator-kill program.

Proposal 75: State-run "predator control" of wolves and bears in Unit 16

I strongly oppose—and protest—this ADF&G proposal, which would allow Fish and Game staff to participate in the "Intensive Management Plan for Moose" throughout Unit 16, including the aerial shooting of wolves, brown bears and black bears. (Though the immediate request is to kill up to 100 wolves annually, the proposal also allows F&G to kill bears if managers decide such actions are warranted.)

There are many reasons this proposal is bad policy, including—and especially—the fact that there is no scientific evidence that the removal of wolves and bears will substantially increase the moose population for hunters. That is, the state is assuming such dramatic kills will benefit moose—and ultimately, human

hunters—without any hard evidence to back up this assumption. To the contrary, a scientific article published in 2022 (of which I'm sure BOG members are aware), based on work done by ADF&G and UAF biologists, found that nearly 40 years of predator control in Southcentral Alaska had not resulted in increased human harvests of moose. In short, throughout much of Alaska predators are being needlessly killed, with no benefit to human hunters,

Another point raised by critics of the state's predator control programs, related to the above, is that the state has shown no ability—or willingness—to rigorously study and evaluate the impacts of predator control programs on wildlife populations. Many independent scientists charge ADF&G with regressive management practices centered around the removal of wolves and bears at any cost and often for no good reason—but at a significant price, both economically and, arguably, biologically. Because the state has failed to properly examine the impacts of its widespread predator-kill programs, it's impossible to say what the long-term impacts are on an ecosystem scale.

It's worth noting that for more than two decades, the state has initiated several predator-control programs in Unit 16, some of them including extreme measures (for instance the killing of black bear females with cubs and even the cubs themselves, as well as the snaring of black and brown bears, including at bait stations). Yet after all these measures were enacted, in 2013 the BOG suspended the predator-control program because there was no evidence that moose calf survival benefited from all the killing of bears over a period of several years. Given that awful record of failure, how can the state initiate yet another major state-run and managed predator-kill program in Unit 16?

In short, I would argue that such large-scale predator-kill programs such as this one are regressive, expensive, and of uncertain benefit, to either ungulates or human hunters. They are a waste of time, effort, money, and wild animals' lives.

There's also this fact: as many others have pointed out, the Unit 16 "control area" adjoins two national parks and almost certainly some of the targeted animals spend part, if not most, of their lives on federal lands where predator-control is not allowed and where all wildlife is valued and respected, and where the presence of wolves and bears is part of the draw that brings many visitors (both Alaskans and tourists) to these places. To kill wolves and bears along the borders of these national parklands is another regrettable aspect of the state's predator-kill programs.

For all these reasons, and more, I would urge the BOG to reject ADF&G's proposal to allow department staff to "remove" wolves (and bears) from Unit 16. It would only continue the state's outdated, regressive, and inhumane policies that are at best of questionable value.

Proposal 82: Areas Closed to Trapping, Palmer Trapping Setbacks

I strongly support this proposal, which would establish 50-yeard trapping setbacks along certain "highly developed" trails in Unit 14. The trails included in this common-sense proposal were identified by a stakeholder group that included trappers, wildlife advocates, and local residents concerned about the safety of dogs in areas where trapping is allowed. I won't go into the specifics of the proposal, but the fact that people representing different interest groups settled on these trails and the need for trapping setbacks should be sufficient evidence/argument that the BOG should approve this proposal, to help keep dogs away from traps in popular recreational areas.

PC253

Name: Kim Simpson-Meeks

Community of Residence: Evergreen, CO

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Kim Simpson-Meeks DATE: December 22, 2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

NAME: Kim Simpson-Meeks

ADDRESS: [redacted], Evergreen, CO 80439

PC254

Name: Michelle Sinnott

Community of Residence: Anchorage

Comment:

Proposal 75 - I strongly disagree with and oppose this proposal. Targeting predators as a means to increase human harvest of prey species is not effective; it is an outdated, cruel, and scientifically unsound management practice that Alaska needs to move away from. Unless the Board of Game can produce sound and reliable data showing that reduced harvest numbers is caused by predators, in this case bears and wolves, then there is no evidence that mass slaughtering these animals will lead to the desired result. At a minimum, the Board needs to remove bears from this proposal because there is no evidence presented in the proposal about bear population numbers, meaning that the constitutional requirements of ensuring sustained yield cannot be meet.

Proposal 82 - I support this proposal. As someone who recreates with companion animals on public lands, trapping is a perpetual fear. I have taken the classes to learn how to remove dogs from traps and I avoid certain trails at certain times of the year. I firmly believe that trapping should not be allowed on public trails at all, but this proposal is at least a recognition that we have to make changes to reduce the risk for trail users. Trapping setbacks help improve the safety of trails and are successful.

Proposal 11 - I support this proposal. The Board of Game is seemingly, at least, singularly concerned with increasing hunting opportunities, but it should also be concerned with public perception of hunting in Alaska because our state depends so heavily on tourism. Katmai National Park is a world-renowned destination for bear viewing. I firmly believe that we shouldn't allow hunting near National Parks at all, but if the Board of Game wants to avoid calls to boycott Alaska because of its hunting practices and predator control tactics, then reducing the brown bear hunting season near Katmai so that hunters and wildlife viewers don't overlap is a good place to start.

Proposal 29 - I support this proposal. The Mulchatna Caribou herd has been declining for decades, and state biologists have determined this reduction is because of lack of food and disease largely driven by climate change. The Board of Game has already approved a mass murder of bears and wolves based on the fiction that doing so with improve the herd, which state biologists have already made clear it won't. If the Board of Game actually wants to address the decline of this herd, it has to take a hard look and reevaluate the population and harvest objectives for this herd. Sustained yield is a constitutional requirement and the only way to meet that requirement is to have an accurate and reliable assessment of the herd. Blindly blasting away wolves and bears hoping for the best is not sustained yield.

PC255

Name: Sue Sippey

Community of Residence: Florida

Comment:

I oppose the airborne hunting of wolves and bears to reduce the population on unit 13 and 16 specifically and any other units for the purpose of population control.

Proposal 58 and 75.

Barbaric unnecessary tactic . I realize hunting is part of the Alaska culture but this is slaughter.

NO!

Sue Sippey

PC256

Name: Zachary Smalls

Community of Residence: Girdwood

Comment:

I am opposed to proposal 51 (and 52). I have been a part of guided, nonresident hunts in this area over the last several years and the sheep population appears to be very healthy. Proposal 51, and 52 would bring too much attention to this area and would likely increase harvest. With an already fragile sheep population across the state, it would be a bad idea to make a change that increases harvest. If it ain't broke, don't fix it. It would also negatively affect the livelihood of an Alaskan family-run outfit that has been in that area for over 6 decades.

PC257

Name: Adhley Smoyer

Community of Residence: Richmond, va

Comment:

I oppose #73. Please let these animals live in their natural habitat without being senselessly murdered.

PC258

Name: Megan Snyder

Community of Residence: Seattle, WA

Comment:

I SUPPORT Proposal 11.

This proposal would restore the hunting season to the pre-2022 length and would reduce human-wildlife conflicts.

With the early season hunt, operators were still dropping off sport fishermen and wildlife viewers on rivers where bear hunting was taking place. Hunting camps and hunters were occupying critical habitats where bears were fishing, forcing other users to avoid these areas.

Bears were shot right at the outlet of the Kulik River. The Kulik Lodge had employees breaking down camp, there were several groups of sport fishermen on the river as well as wildlife viewers. A bear had cached a hunter-shot carcass right at the outlet of the Kulik River where aircraft picked up sport fishermen and other visitors.

PC259

Name: Megan Snyder

Community of Residence: Seattle, WA

Comment:

I OPPOSE Proposal 9. Lengthening bear season in and around Katmai and Lake Clark where humans congregate for bear-viewing and fishing is likely to increase wildlife-human conflicts and negatively impact tourism activities across the unit.

PC260

Name: Mike Soik

Community of Residence: Anchorage

Comment:

Mike Soik

Anchorage, AK

Chair Hoffman and fellow board members, thank you for your consideration of my comments.

Proposal 81

I am opposed to proposal 81. This proposal could force trappers to travel during hazardous weather conditions unnecessarily. What if the trapper suffers in illness or injury that prevents them from making the 36 hour deadline? What if the trapper has mechanical problems with their vehicle and can't have

repairs made it time? What if the roadway is closed due to weather or accident? How is the trapper supposed to document the trap check time/date in a manner to satisfy law enforcement?

Trappers should be able to adjust their trap check schedule based on furbearer population densities and travel patterns instead of some arbitrary timeframe. This proposal would waste a trappers time and resources.

The author of this proposal suggests it is inhumane to leave a trapped furbearer in a trap or snare to die of starvation or exposure. However, if the trapper is using conibear traps, snares, or underwater (drowning) sets the furbearer is going to be dead.

As this proposal would place an unnecessary burden on trappers with no benefit to the furbearer resource I ask that you reject this proposal.

Proposal 82

I support proposal 82. As a trapper I have a few concerns about this proposal. I don't want this to turn into a camel's nose under the tent situation where the setback distances are gradually increased further and further from the trail. I also don't want this to start an influx of trail setback requests for any trail that is used by a non-trapper. These regulations should be readily available for the trapper to find in the trapping regulations booklet. The trapper shouldn't have to be an internet search wizard to find these regulations. That is the problem when municipalities like Anchorage make up trapping regulations. You have to go and find the regulations in the municipal codes.

If these regulations can be implemented in a manner that is easy for trappers to find and understand I ask that you accept this proposal.

Submitted by: Ted Spraker
Community of Residence: Soldotna, Alaska

Chairman Hoffman,

First, thank you for the opportunity to comment on proposals that the Board will address during the January meeting. I have comments on all of the issues but will be brief. If there are any questions concerning my position on a proposal, please give me a call at [redacted]

1. Brown bear tag fee exemption. **Support as written**

2. Extending the bear baiting into the fall. **Opposed**. The use of bait to attract bears is not designed as a predator control method, it is an opportunity to increase hunting opportunities. Additionally, establishing bait sites in the fall will conflict with other hunting seasons, keep in mind that not all hunters support hunting bears over bait. This will lead to more requests to prohibit the use of bait as these conflicts arise. Baiting is a traditional spring activity; we should keep it that way.

3. Cellular trail cameras. **Opposed**. When this issue was addressed by the Board several years ago, there was a clear message during public testimony that this was not an ethical use of technology and did not support fair-chase hunting. This is another example of risking the loss of baiting when methods are too liberal. Some states don't even allow trail camera use.

4. Establish general season archery only hunts. **Opposed to all requests**. The Board has approved early season archery only moose hunts and several other archery only hunts near residential areas where hunting with firearms is not warranted. In this large state, there is ample opportunity to hunt using the method you prefer without creating additional hunts for special interests.

5. Southern Alaska Peninsula Caribou. **Opposed**

6. Southern Alaska Peninsula Caribou. **Opposed.**

7. Southern Alaska Peninsula Caribou. **Support.** Following a targeted predator control program on wolves, the Southern Alaska Peninsula herd increased dramatically and is currently exceeding population objectives set by the department. This increase in herd size provides excellent hunting opportunities but the area is difficult to access. Increasing seasons may help in maintaining the herd within its carrying capacity.

8. Clarification for the Umnak Island reindeer herd. **Support, with an amendment**. This reindeer herd should be classified as "deleterious exotic wildlife" with no season or bag limit, not as caribou. The reason the Board classified reindeer on

Kodiak as caribou was to actively manage the herd and reduce over harvest. The Kodiak reindeer herd size is 200-300 animals. The Umnak herd is estimated at 5,000 and has never been managed and due to the difficulty to access the area, I doubt the department is willing to actively manage them now. This clarification may lead to more hunting opportunities that are needed to maintain this herd's size.

9. Proposals 9-18. **Opposed to all**. Unit 9 brown bear seasons. Unit 9 is such a large Unit there are clearly differences in weather patterns between subunits. For subunits 9D and 9E, I suggest that the board consider keeping the spring season in even years at May 10-31 but change the fall season in odd years to Oct 1-15. The comments I have heard for Unit 9 hunters are that the later Oct. season is difficult due to weather conditions.

19. Proposal 19 and 20. Season for Arctic Fox on Pribilof Islands**. Support**. I do not know anything about the status of arctic fox but this seems like a reasonable request that still provides hunting opportunities.

21. Bag limit on beaver in Unit 9. **Support.** This may provide for additional opportunities and does not seem to be a conservation concern.

22. Hunting season for wolverine in Unit 9 reduced. **Support.** There is a strong argument that all wolverine hunting and trapping should ends at the end of February to protect breeding females in the den.

23. Nonresident Emperor Geese permits. **Support, with an amendment**. I think the author recommended a large number in hopes of gets a substantial increase in permits. I suggest increasing each area from 25 to 50. This will give the Board time to evaluate the perceived interest.

24. Hunting Arctic Hares closure. **Support**. From the data presented, there is no longer a harvestable surplus.

25-28. Unit 17A moose seasons**. I support all of these to increase the harvest** opportunity and slow the local population's growth.

29. Change Mulchatna Caribou herd objectives. Opposed. With the recent targeted predator control on the calving grounds, I recommend waiting to evaluate the response in herd growth.

30. Mulchatna moratorium. **Opposed**. I support not hunting this herd until we see positive growth but hunters will expect the season to be opened after three years and it may not support a harvestable surplus in that short period of time.

31. Close resident caribou season in 9B, 17 and 19. **Take no action**. With reference to the regulations book, these areas are already closed. I do support the proposal to keep the areas closed until they see documented growth.

32. Allow year around harvest of brown bear in 17**. Support**. The board adopted a similar request for unit 13 many years ago and it has not resulted in over harvest. And, Unit 13 has far better access when compared to Unit 17. The few bears taken during summer are now reported.

33-34. Same day hunting of brown bears and wolves in Unit 17. **Opposed**. Same day airborne hunting is highly controversial and should only be allowed under intensive management conditions.

35. Wolverine trapping in Unit 18. **Take no action**. Not of the call for this meeting.

36. Reduce season for wolverine in Unit 17. **Support**. All harvest of wolverine should end by the last day of February to protect denning females.

37.Remove the two per day bag limit on beaver in Unit 17. **Support**. Same justification as proposal 21, not a conservation concern.

38. Change hunting season on Walrus Island to harvest walrus. Support. The hunting season was possibility set to accommodate the non-local visitors to the Walrus Island to view walruses. A five-day change should still allow for both users.

39-42. Reduce harvest objectives in Unit 13. **Opposed**. Harvest and population objectives should remain as originally set to encourage managers to strive to increase prey numbers.

43. Antler season in subunit 13A**. Support**. See department comments.

44. Establish an antlerless season in 13C. **Support**. See department comments.

45. Archery only. **Opposed**. See comment on proposal #4.

46. Replaces subsistence conditions. **Support**. This is an interesting idea that should be carefully evaluated during the Board process. Subsistence hunting in Unit 13 has been a controversial issue since the early 2000s. The prohibition of motorized vehicles and pack animals should result in a longer season and avoid an over harvest.

47. Archery only in Unit 13. **Opposed**. See note on Proposal #4.

48. Intensive management plan to include caribou. **Support**. With the current status of the Nelchina herd, it should be included in the management efforts.

49. Close caribou hunting in Unit 13 for 6 years. **Opposed**. There shouldn't be a fixed time on hunting this herd in the future. Opening a season should be evaluated on the

herd's growth and ability to sustain a harvest. And hunters will expect the season to be open even if the herd has not recovered following the moratorium.

50. Eliminate DS165 and replace it with harvest ticket. **Opposed**. The reason why DS165 and DS160 were established in 2008 was due to the large number of guides operating in these areas. Until the guide concession program is implemented on state lands this is the only method to maintain a reasonable number of hunters in the area. Most guides in this area supported a draw hunt due to overcrowding.

51-52. Close MacColl Ridge to Non-residents and create a Controlled Use area. **Opposed** to both of these requests. Just closing hunting to non-residents will not solve a crowding problem because residents will be even more encouraged to hunt the area. If overcrowding is the issue, the board should evaluate whether a limited permit system should be established in the areas of concern.

53. Archery only in 13D. **Opposed**. See justification in #4.

54. Eliminate draw hunts in DS160 and DS260 in 13D. **Opposed**. See comment on DS165 in proposal 50.

55. Divide DG720 into three hunt areas. **Support**. DG720 is too large to properly manage goat harvest resulting in high harvest in accessible areas and little or no harvest in areas difficult to hunt. Dividing this area would spread out hunter effort and reduce concentrated hunting is more accessible portions of the hunt.

56. Archery is only for goats in 11 and 13D. **Opposed**. See comments in #4.

57. Change bag limit to two brown bears for Unit 13. **Opposed**. Hunting of bears in a general season is not intended to represent a predator control program. This may result in a slight increase in harvest but most hunters in Unit 13 are primarily interested in harvesting a moose, and few take multiple brown bear due to taxidermy cost and undesirability of brown bear meat. If this request is adopted, it would allow hunters to sell the hide and skull of their harvested bear.

58. Reduce the minimum wolf population following harvest from 135 to 100**. Support**. Given the current caribou status in the Nelchina herd, this increased effort in the predator control program would help their recovery.

59-60. Extend the wolf and coyote trapping seasons in Unit 11. **Opposed.** This early opening was implemented in Units 7, 13 and 15 to increase wolf trapping opportunities several years ago. The Unit 13 early season is still in place but Units 7 and 15 have gone back to a November 10 opening because few trappers were interested in starting that early, they were concerned about hides not prime and difficulty in accessing trap line before adequate snow cover. Additionally, brown and black bears are still out of their dens in mid-October, and bears were being snared.

These proposals request an increase in trapping but do not align with the limits in Units 12 and 13 where only snares of 3/32 or larger are used prior to Nov. 10. Setting leg hold traps for wolves and coyotes could potentially catch lynx that are not prime and of little value in October.

Trapping seasons are established to provide harvest opportunity and are not intended to mitigate losses of prey as a predator control program.

61. Change seasons for Ptarmigan in Unit 13. **Support.** These requests have been proposed for over 30 years and there doesn't seem to be a reasonable compromise among hunters. Proposal 61 is the best in my opinion because it starts on August 20 so birds are a little more grown and ends on February 15. When hunting ptarmigan after February, when snow machine travel is easy, results in chasing flocks until your limit is reached.

62. Extend the ptarmigan season. **Opposed**. These season date a far too liberal.

63. Require a registration permit to hunt ptarmigan. **Opposed**. I realize data is important but this is a huge inconvenience to hunters that are primarily in the area to harvest species other than ptarmigan. I think there are other ways through social media programs to acquire harvest data other than a required registration permit.

64. Reauthorization of antlerless hunts. **Support** as justified in proposal.

65. Reduce number of antlerless moose tags to half and limit areas of hunting. **Support with an amendment.** I would not reduce the upper limit placed on number of tags issued, in some years more than 1000 tags may be needed. I do support directing the antlerless tags to areas with the highest concentration of moose.

66-67. Archery only moose hunt. **Opposed.** See comments in Proposal #4.

68. Change bag limit in Tier II hunt in 16B. I would need more information about why this hunt is set up as it is.

69. Shorten the Tier II winter season. **Support**. This season could be shorter and still provide ample opportunity to harvest a winter moose.

70. Extend brown bear season to June 15 in subunits 14A and 14B. **Support**. This will provide additional hunting opportunities in the spring.

71. Extend brown bear season in 14B to June 30. **Opposed**. I support a longer spring season ending June 15th but June 30th is too long. The later you hunt in June, the higher the probability of harvesting a bear with a poor hide.

72. Eliminate the harvest ticket in 16. **Support**. In units where black bears must be sealed, a harvest ticket should not be required.

73. Change bag limit in 14A sheep draw hunts. **Support**. As long as its managed under a limited draw-hunt, this request is justified. The only concern may be a reduction in the number of permits issued.

74. Archery only sheep hunt. **Opposed**. See comments in proposal #4.

75. Allow department personnel to conduct predator control in Unit 16. **Support**. With the increase in the infestation of lice in wolves, hunters will seek other areas to conduct predator control. Current population estimates exceed management objectives.

76. Same day airborne hunting of brown bear in Unit 16. **Opposed**. This provision is allowed at registered bait stations but should not be allowed to hunt brown bears.

77. Extend brown bear season in 14B to June 15. **Take no action** due to action taken on proposal 70.

78. Open same day airborne wolf hunting in predator control areas to everyone. **Opposed.** Under intensive management protocol, the number and experience of permitted pilots and gunners is required to maintain control on those that participate. This request would eliminate the level of compliance needed for a controlled hunt.

79. Extend wolf trapping to April 30th in 14A. Trapping seasons need to be similar in adjacent subunits to reduce confusion.

80. Require sealing of beaver in Unit 16**. Support.** The decline in numbers of beaver is not limited to Unit 16. Sealing data and the opportunity to talk with trappers may provide some insight to why these declines are occurring.

81. Require a 36-hour trap check in Unit 14A. Opposed. There is no clear justification for this requirement and it would eliminate many trappers that would not be able to check their trap lines on this schedule.

82. Trap line setbacks in Unit 14. **Support.** I support this as a reasonable requirement near established public trails as long as within the 50-yard setback, traps are allowed if they are elevated to three feet, enclosed, or underwater or ice.

Ted Spraker
Soldotna, AK 99669
[redacted]

PC262

Name: Jay Stanford

Community of Residence: Anchorage

Comment:

I am a lifelong Alaskan and I am an active registered guide that works for the lodge that is mentioned in these proposals. I am writing to OPPOSE proposal 51 and 52. There is no need for either one of these proposals and I believe that if passed would negatively affect the sheep in the area.

The writer is looking to create resident opportunity in the area and that already exists. The area is already open to all sheep general harvest tickets, including residents. The writer also suggests that the sheep on McColl Ridge are an isolated population with low numbers. From my extensive time and experience on this exact ridge, I can say both of those statements are false. Sheep can move between McColl Ridge and other parts of the upper Chitina River if they chose too. They are not land locked, I personally, have seen them move freely.

The proposal is also concerned with a hunting lodge being at the base of McColl Ridge. That lodge is Ultima Thule Outfitters. It is a family run guiding service that has been operating out of that area since the 1960's; four generations of this family have lived and guided on this mountain. I am a part of this fourth generation, by marriage.

Due to federal exclusive guide concessions they are the only commercial outfitters permitted in the area and that alone limits the number of nonresidents permitted to hunt there.

I have first hand knowledge of Ultima Thule's practices and how we self regulate the number of hunters we take due to our knowledge of what the area can handle. Every year we take significantly less hunters than what is allotted in our NPS concession.

If these proposals pass, it would set precedence that all nonresident hunting should be shutdown in areas that have lodges that conduct guided hunts. The writer also believes that these proposals would lessen the competition for resident hunters. I believe that if passed this would actually do the opposite. It would get rid of one or two nonresidents but it would create a highlighted zone in an open area. Instead of pressure being spread out throughout unit 11, resident hunters would be drawn to McColl Ridge thinking that they will have better opportunity since it resident only "management area".

This would create overcrowding and conflicts among resident hunters, the competition would increase. This would also set precedence to make every single ridge, mountain top, valley, etc its own management area. For these reasons, I strongly OPPOSE proposals 51 and 52.

PC263

Name: Hannah Steele

Community of Residence: Milwaukee, WI

Comment:

SUMMARY:

I am OPPOSING ALL proposals except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69. These proposals would be incredibly detrimental to wildlife populations in Alaska. As a non-resident, I am deeply invested in conservation efforts in Alaska and plan to support protecting wildlife through eco-tourism money - I will be taking a trip to Brooks Falls in 2024. I firmly believe that the profits from this form of wildlife tourism taken in conjunction with the importance of keeping bear, fox, moose, etc. populations stable and healthy far outweigh whatever financial benefits could be gained from opening hunting opportunities as proposed in these proposals.

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature’s balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

PC264

Name: Derek Stonorov

Community of Residence: Homer

Comment:

As a 60 year resident of Alaska, as a similar time frame user of GMU 9 as a hunter, bear viewing guide, photographer, ADF&G employee, and commercial fisherman, I unequivocally support Proposal 18.

Mr. Bachrach's argument for a drawing permit hunt for 9C, a return to the old hinting dates of October 10-25 and May 10-21 and one bear every four years would be a solid move forward in the conservation of brown bears for this area.

His proposal spells out in detail his rational for the regulation changes. I agree with every point.

I will add that both the NPS and ADF&G are responsible for the poor management of 9C, especially the Katmai Preserve sub units. The "abundance" surveys used by both agencies do not stand up to scientific scrutiny. This is evidenced by the lengths the ADF&G went to in the Haines area and the USF&WS used on the Kenai to acuately ennumerate brown bear numbers and age and sex of the resident populations.

When ADF&G and NPS suggest an expanding population of brown bears for 9C I urge the BOG to look outside the agencies for proper scientific validation of the unproven ideas that increased cub numbers and continued harvest of 8-10 year old males are indicators of healthy and sustainable brown bear populations.

PC265

Name: Lynn Sullivan

Community of Residence: Arkansas

Comment:

I OPPOSE proposal 76. I believe we need to stop trying to control nature and let events happen naturally. This proposal is horrific! Please STOP this.

PC266

Name: Mandakini Swamy

Community of Residence: California

Comment:

Prop 75- oppose! Culling wolves, bears (black and brown) through aerial kills is a waste of those animals and the # you'd like to reduce the population of each to is based on economic goals instead of doing what is best for those animal populations.

In tandem with the other listed propositions, you are hurting the local ecosystem and aiming for extreme short terms goals instead of focusing on how you can live in harmony with these animals on THEIR land.

Prop 81- support this prop but would also like to add that this shouldn't be just for those near roads but for all traps as they are usually cruel and painful for the animal.

Props 16-17- oppose. In tandem with the culling that is proposed for these animals, there is the possibility of reducing #s drastically.

PC267

Name: Clair Swartzentruber

Community of Residence: Kenai

Comment:

I write concerning proposal 3, regarding the use of cellular trail cameras at bait stations.

While I do not hunt the specific units listed in the proposal, I am an active bear hunter in unit 15. I strongly support the use of cellular trail cameras at bait stations, and would like to see it allowed statewide. There are multiple reasons I believe this proposal should be adopted.

First, it will allow real-time knowledge of activity at the station, and prevent unnecessary trips to restock if there is little activity, and allow a hunter to bring more bait sooner, if there is heavy activity. This results in more consistent baiting activities, and helps hunters who have limited hunting opportunities to capitalize on the time and financial resources they do have.

Second, having daily knowledge of the various bears who are visiting the station allows better targeting of specific bears, and would help reduce the chances of sows with cubs being taken, as the hunter is more familiar with the single bears and/or family groups using the station.

I don't believe the use of cellular trail cameras is anywhere near the advantage of airborne flights or drones. A trail camera has to be posted in a single spot, and doesn't roam around looking for game. In the specific use at bait stations, it can safely be assumed that bears are in the vicinity of the station daily, and the fact that the hunter could receive near live verification of the bears at the station will not have a significant impact on how he or she hunts the station on the day of the notification. If he/she is near enough to get to the station upon receiving a photo, in time to catch a specific animal there, they will, in all reality, already be at the station hunting it. This is very different from airborne flights and drones, where a birds-eye view and large areas covered can certainly be an unfair advantage. In the case of bear bait stations, the hunter has already committed to one particular spot, and spent significant time and money establishing the station. Utilizing a camera that can send daily updates is a tool that can help make trips more efficient and productive, and helps the hunter select the best animals for harvest. He is going to hunt the station either way. Having more information just helps them do it better.

I strongly urge the board to adopt this proposal as a state-wide regulation change.

PC268

Name: Kelly Sweeney

Community of Residence: Glencoe, CA

Comment:

December 26, 2024

Re:

Written Responses to the current wildlife management proposals of the Alaska Department of Fish and Game (ADFG).

Statement: I am OPPOSING ALL except:

Support with amendment, 5, 6, 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

To officials of the Alaska Department of Fish and Game,

I am writing to you today in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG) regarding the state's Predator Control Program. Many of these proposals would harm Alaska's iconic wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies. According to

Alaska Public Data (alaskapublic.org), tourism to and within Alaska, especially in the area of wildlife viewing, was responsible for $5.6 billion in economic activity in 2023. According to the same source, over the same time period, other outdoor recreation, including hunting, drew in $3.1 billion to the state's economy. This suggests many more people would prefer to see living wildlife, rather than hunt and kill it.

Encouraging overhunting may bring short-term profits from hunting related licenses and permits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run. Studies done in the areas of Yellowstone and Grand Tetons National Parks in Wyoming, Montana and Idaho provided eye-opening information about the economic value of living wildlife over time vs the one-time value of a hunting tag, leaving no question that wildlife is worth more alive than dead. While humans are notoriously averse to forward thinking, it is easier to preserve this economic treasure than to suddenly find that both the tourism AND hunting industries are in freefall because of overly aggressive "management" of wildlife.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead. Let us not forget that bears are an umbrella species, critical to the ecosystems in which they live. If, as ADFW has stated, we don't know precisely how many bears there are, agressive culling is clearly very, very risky.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

We spend so much effort and time telling people NOT TO FEED WILD ANIMALS. Baiting should be illegal, if feeding when not hunting is illegal.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling. Why give hunters such an advantage?

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance. If you will remember, early America's penchant for overhunting is what caused many of the nation's iconic wildlife to have to be brought back from the brink of extinction. Let's not do that again.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy. This one is the only one that actually involves inconvenience to humans. And limiting the caribou hunt is something your department itself publicly stated, in 2022, was the BEST WAY to recover caribou populations. The truth is that bears rarely kill deer, caribou, or moose themselves. They are opportunistic and will usually scavenge ungulate carcasses left behind by wolves or human predators.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy. Again, we SHOULD inconveniece humans, by decreasing caribou hunting, so that caribou populations can recover.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren’t native, allowing hunting could disturb the island’s natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm. This terrible proposal also will condemn many cubs to death, as even for seasoned experts, determining the gender of a bear is not easy, and mother bears "stash" their cubs in safe places so they are hidden while the mother seeks food. In our "shoot first, ask questions later" society, this will almost certainly lead to an increase in cub mortality, which is already 50% or higher, according to ADFG statistics.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population. Spring hunting should not be allowed because this is when cubs of the year are most vulnerable. Without

the mother bear, the cubs will be preyed upon or starve to death, a terrible fate we have the power to prevent. And we must.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants. This is also another vulnerable time for cubs of the year about to den for Winter.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term. As already stated, lengthening bear hunting season is a terrible idea. Bears are, after all, one of the slowest to reproduce land mammals on the planet, and cub mortality is already high without increased hunting pressures.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears. With wolverines still vulnerable everywhere they are found, they should still be protected, not trapped and hunted.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans. Overhunting moose then means bears and wolves get killed in higher numbers, because this is all just a vicious cycle of bad ideas.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem. ABSOLUTELY OPPOSED TO THIS.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment. This is a practice no civilized nation should consider. And certainly not one that manages wildlife based on SCIENCE.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals. No trapping, no hunting, should be taking place in areas designated sanctuaries or refuges.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance. We the taxpayers do not support the idea that overhunting by humans should be corrected by humans killing more natural predators.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem. Already stated, opposed to any increase in brown bear killing.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems. Wolves will, if allowed, keep weak, sick ungulates under control, resulting in a healthier population of ungulates for humans to enjoy.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse. And then what? Kill more wolves and bears?

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive. Rather than being at war with wildlife, we the People wish our government agencies to MANAGE wildlife with an ethical approach. We value wildlife alive, and in its natural environment, and believe that protecting nature over the long term should be prioritized over this hunting season, or even the next 5 years' worth, of hunting seasons.

I have heard many in wildlife management bemoan the public's negative perception of them, and I hope after reading this, should you actually do so, you may have a greater understanding of WHY public perception of government wildlife agencies IS so negative. You can repair that reputation by taking an ethical view, and forcing humans to bear the inconvenience of a smaller bag limit so that Alaska's iconic predators may survive for future generations to enjoy.

Thank you for listening.

Kelly R Sweeney

Glencoe, CA

PC269

Name: Jethro Swihart

Community of Residence: PALMER

Comment:

I am in support of proposal 3 and proposal 70. Bear hunting has become increasingly difficult over the years due to the increase in population and increase in land development along with weather changes depending on the season. These proposals will give hunters a better chance for successful management of game while protecting our hunting rights.

PC270

Name: Barbara Taylor

Community of Residence: Sun City West, Arizona, USA

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6, 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Barbara L Taylor DATE: Dec 26, 2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). My husband and I visit Alaska every year to explore, fish, view and photograph wildlife, and enjoy the vast beauty that Alaska offers. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. The wildlife of Alaska is worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Visitors, such as my family, will stop coming if there are fewer animals to see, and ecosystems will struggle to recover. Protecting wildlife is much better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because thousands of tourists come to see them every year - alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on the bear population, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

SUPPORT WITH AMENDMENT Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. These bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bear populations at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

SUPPORT WITH AMENDMENT Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits would be a vast improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

SUPPORT WITH AMENDMENT Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause additional problems.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the entire ecosystem.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for other wildlife species.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

SUPPORT WITH AMENDMENT Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers are down due in large part to a decline in habitat quality. Further review of the population and harvest objective would provide valuable data. I

suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts all wildlife and could lead to population crashes that harm the entire environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for all wildlife.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature’s balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem. Thousands of visitors, likely more, visit Alaska every year with the hope of seeing a brown bear in the wild. Alaska should be working on protecting these wildlife populations for the future.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse. This is another wildlife species that is vital to the tourism industry in Alaska.

SUPPORT WITH AMENDMENT 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere that children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of the proposals would hurt wildlife populations and Alaska's environment. Protecting wildlife, and thereby boosting eco-tourism, is a much better long-term solution for the state's economy while ensuring a future for Alaska's wildlife to thrive.

Thank you for your careful consideration.

Sincerely,

Barbara L Taylor
[redacted]
Sun City West, AZ 85375

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December 27, 2024

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 Central and Southwest Region Meeting January 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 do not hunt or trap, and I think of myself as a representative of non-consumptive users. I am a member of the Anchorage Advisory Committee, and participate as a member of the Game Subcommittee.

Please consider my comments on the following proposals:

Region wide and Multiple Units

Proposal 2. Oppose. This proposal would open bear baiting in multiple units, including the remainder of Unit 14C. This area is outside the scope of the Central and Southwest Region, and should not be enacted for that reason alone. It is also objectionable because the remainder of Unit 14C includes the area near the terminus of Hunter Creek where there are numerous permanent residences. There are also thousands of permanent residences in Units 14A and 14B where this proposal also applies. Bear baiting results in bears habituated to human food.

Approval of this proposal would pose a threat to human safety and contradict the efforts being made by the Department and local governments to persuade residents to dispose of their trash in bear proof containers. Furthermore, the purpose of the proposal is apparently to support caribou herds, but there are no caribou in units 14A, 14B, or 14C.

Proposal 4. Oppose. This proposal would provide for an archery only hunt for Dall sheep in multiple units including Units 14A and 14B. Our sheep are declining throughout the State, and it is not only hunters but also non-hunters who treasure these animals. Alaska's Dall sheep need a break, and although the number of sheep which might be taken by archery hunters would be very low, unleashing hundreds of sheep hunters into sheep habitat would undoubtedly stress the remaining few sheep which inhabit these areas. The Anchorage Advisory Committee unanimously opposed this proposal with a vote of 0-11.

Proposals 19 and 20. Oppose. The Department's comments and the information provided in these Proposals indicate that Pribilof Island Foxes are indigenous and endemic to the Pribilof Islands and that this subspecies of Arctic Foxes may be threatened with extinction. Because foxes are not sealed the Department has almost no information on Pribilof Island Foxes. I quote: from the Department's comments as follows:

> "Arctic foxes are not required to be sealed by residents or non residents, and the lack of reporting in trapping questionaires has left little information to ascertain population trends or if current harvest is above or below sustainable levels., Research outside the Department has historically indicated >250 breeding pairs on each of St. Paul and St, George Islands, More recently, a standardized island wide survey conducted in July 2023 on St. Paul documented a total of 57 active dens, 34 of which appeared to be natal , and pups were observed at 26 dens. Outside research suggests that the declining population of Arctic Foxes on the Pribilof Islands is due to loss of natural food sources,"

Under these circumstances Pribilof Island foxes should be designated as an independent subspecies of Arctic Foxes, and all hunting and trapping of this subspecies closed until the Department provides the Board of Game with sufficient data so that the Board can satisfy its constitutional duty to take a hard look at what is sustainable for this subspecies. Hunting and trapping should be authorized only after the Board has the information it needs to make a reasoned decision that this subspecies will not become extinct.

Proposal 21 Oppose. This proposal would remove the two per day bag limit for beaver thus allowing an individual to take all the beaver in several connected beaver ponds in a single day. Numerous drainages in Alaska are devoid of beaver at the current time, for instance the Deep Creek drainage in Unit 15C. Beaver are good for salmon, and for the habitat of numerous other species. It is time for the Board to take action to replenish the populations of this important species, and not further threaten them. It is noteworthy that the Anchorage Advisory Committee unanimously opposed this proposal.

Proposal 22. Support. This proposal would shorten the hunting season for Wolverine in Unit 9. If adopted the hunting season would end on February 28 rather than March 31. The Wolverine denning season commences late in February and allowing season to continue through March is inhumane because the trapping of an adult female will result in the death of her kits from starvation and exposure. The Anchorage Advisory Committee supported this proposal.

Proposal 23. Support. This Department proposal would close all hunting of Alaska Hares in Units 9 and 17. The Department's finding that any hunting is inconsistent with sustained yield is a reassuring sign that the Department has taken the constitutionally mandated hard look. The Board should follow the Department's example.

Dillingham Area, Unit 17.

Proposals 28 and 29. Support. These proposals if enacted would provide for a review of the population and harvest objectives for the Mulchatna caribou herd. Science and realism, and not wishful thinking, should dictate decisions on intensive game management and aerial control of predators. The Alaska Constitution, Article VIII, Section 4 requires a "hard look" at regulatory decisions affecting wildlife, and the setting of reasonable population and harvest goals is part of process, and subject to that mandate.

Proposal 30. Support. This proposal would implement a 3 year moratorium on caribou hunting in Units 17 and 19. If intensive management is truly justified, as including aerial taking of wolves, as the Board has previously determined, then all hunting should be closed until there is reliable data that the herd is recovering.

Proposal 31. Support. This proposal would change state regulations to expressly

state that there is no open season, and provide clarity as to the status of hunting of caribou in Units 9B, 17 and 19. There is obviously an emergency in regard to Mulchatna Caribou, and the Department and the BOG need to do more than kill predators. Clarity in the regulations might help.

Proposal 33. Oppose. This proposal if enacted would provide for same day airborne take of not only bears but also wolves in Unit 17. The take of wolves the same day airborne is prohibited by AS 16.05.783(a) unless specified conditions are found to exist by the Board, including a finding that the authorizing of same day airborne take of wolves is likely to be successful in providing for the recovery of a depleted prey population. The recent history of the sharp decline of the Mulchatna Caribou herd not withstanding several years of authorized same day airborne hunting demonstrates, that airborne killing of wolves is NOT likely to make a difference. Wolves are not bears, and while bears may take large numbers of calves on calving grounds over short periods of time, the same isn't true of wolves. Furthermore, wolf predation by removing the old and sick may be beneficial to Mulchatna Caribou by making available more browse to the young and healthy. The Anchorage Advisory Committee opposed this proposal.

Proposal 35. Support. Wolverine trapping seasons in Units 9(B) and 18 would be shortened to end at February 28. The lengthier seasons ending on March 31 are inhumane because Wolverine are denning in March, and trapping an adult will leave kits in the den to die of starvation and exposure.

Proposal 36. Support. This proposal is confusingly worded, but it appears the purpose is to close the Wolverine hunting season at the end of February so as to not allow the take of Wolverine in the denning season. The trapping or hunting Wolverine in the denning season is inhumane because if an adult female is killed, the kits will be left to starve or die of exposure.

Prop;osal 37. Oppose. This proposal by the Department would remove the 2 per day bag limit for taking beaver in Unit 17. Beaver and their dams and other modifications to our waterways provide for good habitat for salmon and other species. The Department's stated intent is to increase the take of beaver in Unit 17 for the purpose of making it easier for hunters, and if enacted would provide for the removal of more beaver than is currently ongoing. Numerous appellate decisions of the Alaska Supreme Court have held that the Board must take a hard look at the consequences to the natural environment when enacting regulations. A hard look

should make it apparent that enactment will negatively impact the natural environment in the affected areas to the detriment of several species of fish and game.

Glenallen Area - Units 11& 13.

Proposals 39, 41, and 42. Support. These proposals for Unit 13 would adjust downward population and harvest goals which provide "triggers" for the adoption of intensive management programs in the affected subunits of Unit 13. These proposals should be approved because the materials provided show that the current minimum population and harvest goals are rarely, if ever, achieved. Realism should take precedence over wishful thinking.

Proposal 46. Support. This proposal would provide for a non-motorized community hunt in Unit 13. Parts of Unit 13 are crisscrossed with muddy ATV trails seriously degrading the environment. A non-motorized community hunt provides an opportunity to provide local residents with a chance to compete with highly mechanized hunters from outside Unit 13, and may lead to more support for expanded non-motorized zones in Unit 13. A reduction in ATV use in parts of Unit 13 might halt the ever-increasing degradation of the area, and perhaps to some recovery. This would benefit not only local residents, but also non-consumptive users who hike, camp, canoe, and kayak in Unit 13 during the summer.

Proposals 50-54. Oppose. These five proposals address hunting Dall sheep in Unit 13. All five are flawed because they provide for a continuation of the mistaken ideology that taking most or all of the full curl rams is OK in terms of biology. The Department's extensive research indicates that some rams reach full curl at 4 years of age, others at 5 years, others at six, with the bulk reaching full curl at 7 and 8 years, and some never reaching full curl. Alaska's Dall sheep population is in trouble, throughout the State. Non-consumptive users treasure these animals too: that includes myself. I am a mountaineer and for 50 years have spent much of my recreational time high in Alaska's alpine country, where encounters with Dall Sheep are highlights of many of my ascents. Focusing all hunting on full curl rams undoubtedly provides a evolutionary DISADVANTAGE to rams which reach full curl at ages 4-6, and an evolutionary ADVANTAGE to rams that never reach full curl status. Article VIII, Section 4 of Alaska's constitution requires the Board to take a hard look at the impact of its regulations on sustained yield, and that means that the Board needs to address the evolutionary disadvantage of the full curl rule. I

support a system where every hunter must get a permit for a specific area, where the number of permits are limited, with no registration hunts, and a fair allocation of permits to both residents and non-residents. A fair allocation to non-residents is appropriate so that professional guides, and their assistants and staff, can continue the lifestyle that they have come to enjoy and treasure.

Proposals 59 and 60. Oppose. These proposals would lengthen the wolf and coyote trapping seasons in Unit 11 into April, which is the denning season for wolves and coyotes. Taking adult wolves and coyotes during the denning season leaves pups to die of starvation and exposure, and is inhumane.

Proposal 61. Support. This proposal would delay the opening of the ptarmigan hunting season in Unit 13B from August 10 to August 20; and is made by the Paxson Fish and Game Advisory Committee. The Advisory Committee's proposal indicates that chicks along the Denali Highway are unable to provide for themselves as early as August 10. This information should be taken seriously by the Board, which is obligated to take a hard look by Article VIII, Section 4 of the Alaska Constitution.

Proposal 63. Support. This proposal by the Department would require registration permits to hunt ptarmigan in Units 13B and 13E. The purpose is to obtain data, which is obviously a good idea.

Palmer Area - Units 14A, 14B, and 16.

Proposal 70. Oppose. This proposal would extend to June 15 the hunting season for Brown bear in Units 14A and 14B. Bear baiting is authorized in these units, including both Brown and Black bears. Units 14A and 14B contain thousands of homes and cabins, and the trails and mountains are heavily used by hikers, campers, bicyclers, kayakers, boaters and fishers in June. Bear baiting leads to bears habituated to human food, and habituated bears pose a safety hazard to the thousands of people who are recreating outdoors in June in Units 14A and 14B. Unit 16A contains a large number of cabins, and also fishers, hikers, campers, etc. The same safety hazard is presented to these people if the bear baiting season is extended in Unit 16A. .

Proposal 73. Support. This proposal would provide for a draw permit only hunt for for Dall sheep in Unit 14A, with any ram legal. As I indicated in my opposition to

Proposals 50-54, the full curl ideology undoubtedly provides an evolutionary disadvantage to Dall sheep which reach full curl at ages 4, 5, and 6, and an advantage to Dall sheep that never reach full curl. Similar to king salmon in the Kenai river, taking only the biggest and best will lead to smaller of these treasured species. The Anchorage Advisory Committee supported this proposal 7-1. Support was for this reason; and also because enactment would rovide an opportunity for a dedicated and lucky sheep hunter to take his children sheep hunting where there is a chance of success. It is time for the Department and the Board to take a hard look at different strategies so that Dall sheep can continue to be both hunted and viewed by Alaskans. New strategies should be employed in at least some areas of the state. Limiting legal rams to those 8 years old or older is another approach that might work.

Proposal 74. Support. This proposal would establish a resident, archery only, drawing hunt in Unit 14A, with a very limited number of permits authorized. While Dall sheep need to be given a break in Unit 14A and elsewhere, there should be no negative impact if only 1-5 tags are issued, as proposed. Aerial spotting should be banned at the Statewide meeting,

Proposal 75. Oppose. Proposal 75 would add Department removal of wolves, brown bears, and black bears to the Unit 16 Intensive Management Plan. The Department in this proposal is asking the Board to authorize same day airborne take of wolves without going through the process mandated by AS 16.05.783(a). That process requires, among others, that the Board find as follows:

> "...that predation is an important cause for the failure to achieve the objectives [for moose] set by the Board and that predation is an important cause for the failure to achieve the objectives set by the board, and that a reduction of predation can reasonably be expected to aid in the achievement of the objectives."

Those findings cannot be honestly made in light of recent research by the Department's biologist regarding wolf predation on moose in Unit 15C. Furthermore, the proposal is supported by the Department's view that there are too many wolves in Unit 16. The number of wolves is not relevant to the statutory mandate. What is relevant is the population, harvest and health of moose, and whether the Board's objectives for moose are being met. Furthermore, giving the Commissioner the authority to send Department employees in airplanes and helicopters with instructions to take wolves while airborne, with the authority given to the Commissioner for more than a couple of years, delegates to the Commissioner

the ability too much discretion, in violation of the Administrative Procedures Act and Alaska Constitution. Advance, meaningful notice to the public is constitutionally mandated when publicly owned resources, including wildlife, are to be disposed of by the acts of an administrative agency.

Proposal 77. Oppose. This proposal would extend the Brown bear season in Unit 14B to the end of June, and because bear baiting is legal, would pose a safety hazard. See my comments to Proposal 70.

Proposal 81. Support. The undersigned Kneeland Taylor is the proposer of this proposal. It would if enacted require trappers to check their traps every 36 hours ONLY IN A VERY LIMITED AREA within Unit 14A. Specifically, it would apply only to areas within two miles of a publicly maintained roads which are plowed in the winter. Federal regulations require trappers to check their traps in the Kenai National Wildlife Preserve, and most states have similar trap-check regulations. It is inhumane to leave a trapped or snared animal to die of starvation or exposure, regardless of whether the animal is wild or domestic. The State of Alaska provides criminal penalties for owners of domestic animals who leave domestic animals tied up, unfed and unsheltered. Those criminal sanctions reflect public distaste for cruelty to animals. There is no scientific basis for the policy that says it's ok to leave wild animals in unchecked traps and snares to die of starvation or exposure, but which condemns similar treatment of domestic animals. This proposal was endorsed by the Anchorage Advisory Committee. It's time that the Board took seriously steps to mitigate the cruelty inherent in trapping.

Proposal 82. Support. This proposal would provide for 50 yard setbacks for specific traps along specific trails in Units 14A and 14B. The Anchorage Advisory Committee endorsed this proposal. The proposal contains a compromise list of trails agreed to by stakeholders, including both trappers and non-trappers, at a Department facilitated meeting held in February 2023. Notwithstanding the compromise agreement reached by the parties at that one day meeting, the Board rejected it. The South Central chapter of the Alaska Trappers Association has endorsed this proposal, this year, and publicized its approval at a well attended public meeting it sponsored in Anchorage. I attended that meeting and was delighted to hear the news. Trap setbacks are undoubtedly a good idea at places such as the Archangel Road in the Hatcher Pass Management area, where the road is groomed for Nordic skiers, and there are literally hundreds of skiers and walkers using the road on nice winter days. The idea that it is OK to set a 330 Connibear or a

powerful wolf leghold trap on or immediately next to a recreational trail such as the Archangel Road is absurd. Valdez's municipal ordinance providing for set backs and limited closed areas was recently upheld by the Alaska Supreme Court, and the decision makes it clear that the ordinances limiting the placement of traps previously enacted in at least 12 municipalities are valid. It is time that the Department and Board of Game respond to the public outcry for safe trails, trail heads, community parks, and heavily populated neighborhoods.

Proposal 84. Oppose. This proposal would extend the Ptarmigan hunting season to the end of April in Units 14A and 14B. I have spent many wonderful weekends in the mountains in April in Unit 14A and have observed Ptarmigan gathering in large numbers and apparently mating. Extending the hunting season past March 31 would, I assume, have a negative impact on these wonderful birds.

Thank you for considering my comments.

Very truly yours,

Kneeland Taylor

Kneeland Taylor

PC272

Name: Owen Tesson

Community of Residence: Buffalo

Comment:

75: Hunters should be allowed tags, rather than department removal

76: no same day airborne should be allowed

78: no same day airborne should be allowed.

33-34: no same day take should be allowed.

PC273

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.I'm

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69

NAME: Belinda Thompson DATE: 12/23/2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

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Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

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Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature’s balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67,

Support with Amendment 65, 68, 69

OPPOSE Proposals 70 to 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

NAME Belinda Thompson

ADDRESS [redacted], Benbrook, TX 76126

PC275

Name: Patricia Tristan

Community of Residence: New York, NY

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 ,7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Patricia Tristan DATE: December 27, 2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

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Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

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OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

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In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

NAME: Patricia Tristan

ADDRESS: [redacted] New York NY 10009

[redacted].com

PC276

Name: Pat Tucker

Community of Residence: Hamilton, MT

Comment:

This comment is in support of Proposal 19 for GMU 10. This is a modest Proposal that will not affect indigenous hunting rights. Unlike the Arctic foxes of the Aleutions, the Pribilof foxes are native and should not be treated as vermin. Their numbers are declining and the small amount of protection Proposal 19 will give them is warranted. It will, as well as make clear that AF&G is flexible and professional enough to protect an endemic population, while continuing to support the eradication of non native populations in the same GMU.

PC277

Name: Christine Tweedie

Community of Residence: South Portland Maine

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: _____Christine Tweedie_____ DATE:_12/27/2024_____

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Thank you for listening.

NAME Christine Tweedie

ADDRESS South Portland Maine 04106

PC278

Name: Paul Claus, Ultima Thule Lodge

Community of Residence: Upper Chitina River, Chitina Alaska

Comment:

My name is Paul Claus, I own and operate Ultima Thule Lodge at the base of MacColl ridge in the Wrangell/St.Elias National Park/Preserve. I am writing in Opposition to proposal #51 & #52

My family and I have made a living in the shadow of MacColl ridge since the early 1960's, We have made it our year round home since 1978, commercialy guiding both resident and non resident hunters for Dall Sheep. We have been awarded a Comercial Concession with the National Park Service since Concessions were issued after the Park began in 1980.

We have managed MacColl ridge very conservatively and the ridge has maintained a very healthy population of sheep to this day! Since I live so close to the ridge, I have kept an ongoing sheep census for decades and this past spring (2024) had the highest lamb count I have ever recorded!

Since I am the only Comercial Opperator licensed to operate in this area, proposal #51 & #52 only effect me and our operation but it would greatly effect us! MacColl ridge is relatively easy terrain compared to other parts of our area and it is an area that some of our clients are only able to utilize!

Proposals #51 & 52 were written by Mr. Dunshie wherein he states "there needs to be areas of opportunity for resident hunters to hunt sheep without the added competition and pressure from guided nonresidents". I would say that right now the opportunity is equal for both resident and nonresident and that completion goes both ways! Over the years we have been out competed by residents many times, we have never acted like we "owned the country" We have actually aided hunters after plane crashes, boat problems, lost camps and search and rescue!

MacColl Ridge is a healthy ecosystem that I have been closely associated with for more than 60 years, there is no current biological reason to limit sheep hunting on MacColl Ridge, Mr. Dunshie should be thankful that all he has to compete with is me, in a lot of sheep areas that is not the case!

Thank-you for your time and consideration on this matter!!

Sincerely,

Paul Claus

PC279

Name: Holly Gamblin, University of Manitoba

Community of Residence: California

Comment:

As a certified Associate Wildlife Biologist, PhD Candidate, and an Arctic fox researcher, I support Proposal 19 and Proposal 20. Similar to the protected status of each of the Channel Island fox subspecies, it is critical to protect genetically distinct subspecies of Arctic fox.

PC280

Name: Deney Vale

Community of Residence: New Zealand

Comment:

We are travelling to Alaska next year and was so gutted to hear this was being proposed as a way of managing numbers. I had thought that Alaska treasured it's wildlife and to hear that they would be reduced to being shot from the sky like they meant nothing was awful. I won't pretend to understand the environment and social implications of hunting these predators but I imagine that myself and a large population of tourists that come specifically to view the wildlife would be vehemently opposed this type of game control. These animals that provide a huge revenue for your country deserve better than what is being proposed. So yes I am opposed to this Proposal 33 of airborne Takes on Wolves and Brown Bear

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PC281

Name: Craig Van Arsdale

Community of Residence: Soldotna

Comment:

Proposal 1: Support

Proposal 2: Support in units 9,11,13,14B and 17. Do not support in 14A and 14C is a unit outside of this proposal book.

Proposal 3: Oppose. While most areas in Alaska do not have cell phone service the areas that do could provide a hunter with data that if acted on is questionably not fair chase.

Proposal 4: Support. Archery hunting sheep has very little impact on sheep but provides maximum opportunity to hunters wanting to hunt sheep on a Harvest Ticket basis. Archery hunting sheep alongside hunters with rifles makes the pursuit even more difficult.

Proposal 5: Oppose. These claims are in contradiction to ADFG biologist reports on the condition and surveys of the herd.

Proposal 6: These claims are in contradiction to ADFG biologist reports on the condition and surveys of the herd

Proposal 7:Support

Proposal 8: Support clarification

Proposal 13:Support

Proposal 18:Oppose

Proposal 21:Support

Proposal 22:Oppose

Proposal 25: Oppose

Proposal 26:Oppose

Proposal 27:Support

Proposal 28:Support

Proposal 32: Support

Proposal 33:Oppose

Proposal 34:Oppose

Proposal 37: Support

Proposal 39:Support

Proposal 41:Support

Proposal 42:Support

Proposal 43:Support

Proposal 44:Support

Proposal 45:Support

Proposal 48:Support

Proposal 50:Oppose

Proposal 51:Oppose

Proposal 52:Oppose

Proposal 53:As the author of this proposal I support proposal 53. Archery drawing hunts DS140 and DS141 are becoming increasingly popular among sheep hunters and thus the drawing odds are becoming more difficult. Additional opportunity for Resident hunters to pursue sheep with Archery equipment has been requested for many years to no avail. A hunt of this nature would provide a much wanted opportunity to hunters while having little to no effect on sheep populations.

Proposal 54:Support. With ram populations low there should be less ANY RAM bag limits.

Proposal 55:Support

Proposal 56: As the author of this proposal I support proposal 56. Archery Goat hunting opportunities are limited in the state. Adding additional Archery Only season dates to this hunt will allow more hunter opportunity with little to no effect on population.

Proposal 57:Support

Proposal 58:Support

Proposal 59:Support

Proposal 60:Support

Proposal 64:Support

Proposal 65:Support

Proposal 66:Support. Archery hunting provides extra hunter opportunity with little to no effect on populations.

Proposal 67: Support. Archery hunting provides extra hunter opportunity with little to no effect on populations.

Proposal 70:Support

Proposal 71:Support

Proposal 73:Oppose. Sheep numbers are in decline and Full Curl regulations are effective to harvest mature rams only.

Proposal 74: As the author of this proposal I support proposal 74. Archery drawing hunts DS140 and DS141 are becoming increasingly popular among sheep hunters and thus the drawing odds are becoming more difficult. Additional opportunity for Resident hunters to pursue sheep with Archery equipment has been requested for many years to no avail. A hunt of this nature would provide a much wanted opportunity to hunters while having little to no effect on sheep populations

Proposal 75:Support

Proposal 76:Oppose

Proposal 77:Support

Proposal 78:Oppose

Proposal 79:Support

Proposal 81:Oppose

Proposal 82:Oppose

PC282

Name: Katherine Van Atta

Community of Residence: Wasilla

Comment:

I support proposal 82 to limit trapping near multi use trails. I frequently ski and hike with my dogs on the Independence Mine, Archangel and Gold Mint trails in Hatcher Pass, and would greatly appreciate not having to worry about my dogs getting caught in traps. Thank you.

PC283

Name: Emma Vawter

Community of Residence: Colorado

Comment:

I am opposed to proposal 75. As an American, there are so few places like Alaska left in the world and the coastal brown bear population there is precious. To overhunt bears, from the air, in order to boost numbers of the ungulate population for hunting purposes is backwards and in my opinion, evil.

I support proposal 11. The bear hunting season should be shorter, and should not overlap with the bear viewing season.

PC284

Name: Neil Walsh

Community of Residence: Anchorage

Comment:

I am in supports of proposals 3 and 70 for the use of cellular game cameras and an extended brown bear season for unit 14. The earliest I've seen a brown bear on my bait in unit 14 is the 1st of June

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Community of Residence: Soldotna for the past year. Dillingham from 2001-2023

From: Patrick Walsh
To: Alaska Board of Game
Subject: Comments on Proposal 29

Thank-you for the opportunity to comment on Proposal 29, which recommends re-assessing population objectives for the Mulchatna Caribou Herd. I am the proponent of this proposal, and thus support it. I ask that you consider these additional thoughts as an amendment to my original proposal:

What are the current population objectives? 30,000 – 80,000.

When were these objectives established? They were first established at >25,000 caribou in 1987 during the exponential growth phase of a population irruption that began in approximately 1984 (Fig. 1). They were modified in 2002 midway through the crash phase to 100,000 -150,000 caribou. They were modified again in 2008 to 30-80,000 and have remained there since.

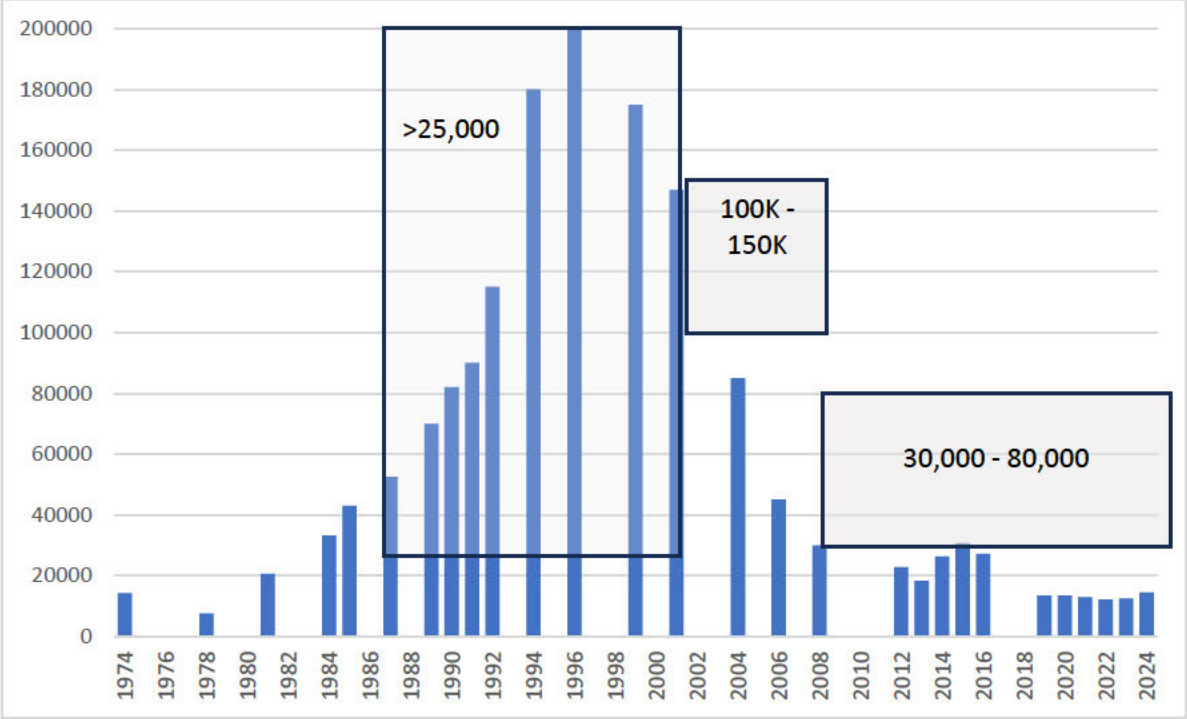


Figure 1. Abundance estimates and population objectives (in boxes) of Mulchatna Caribou Herd.

Why are the objectives out-of-date? The current objectives are based on population size during the population irruption. Since then, caribou abundance has returned to its pre-irruption state—well under the range of the population objectives (Fig 2).

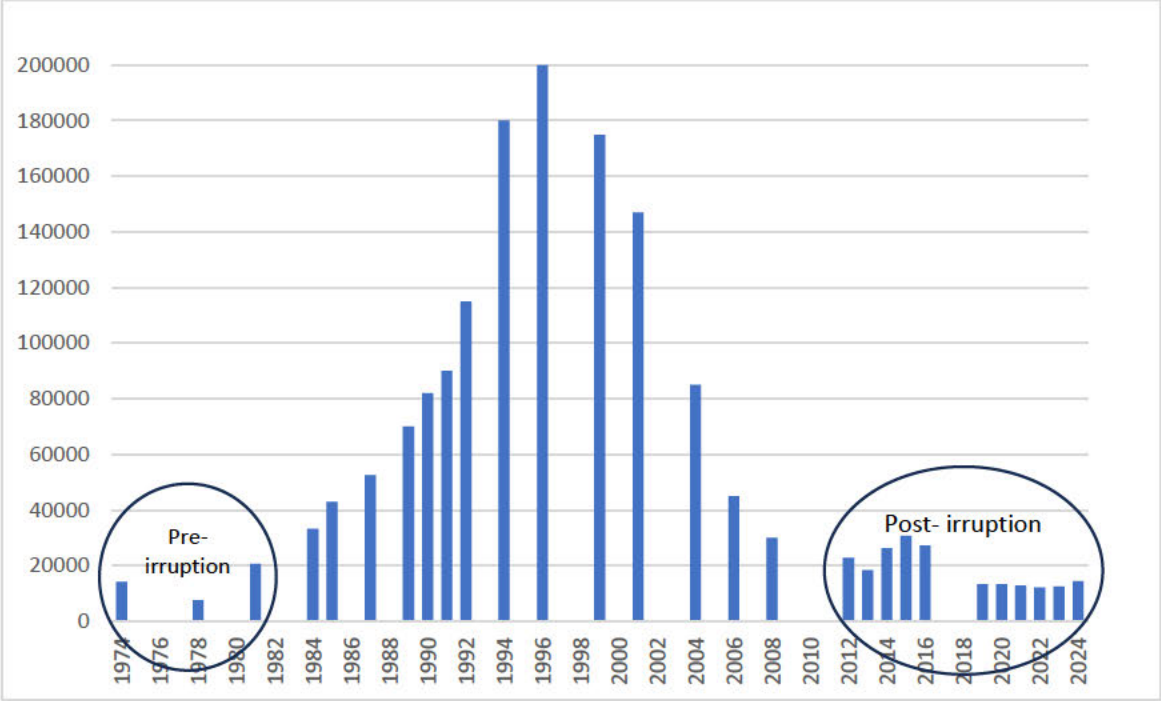


Figure 2. Abundance estimates before and after population irruption of the Mulchatna Caribou Herd.

What are reasonable population objectives? Objectives based on the current ecological conditions of habitat capacity and population structure.

Habitat capacity: Habitat capacity can be assessed by estimating the quantity of winter forage available. In the absence of a habitat assessment, it is worth considering the habitat changes that have been documented in the adjacent Nushagak Peninsula Caribou Herd (NPCH), where grazable lichen abundance has declined to near depletion (Fig. 3, Aderman 2020 and unpublished data).

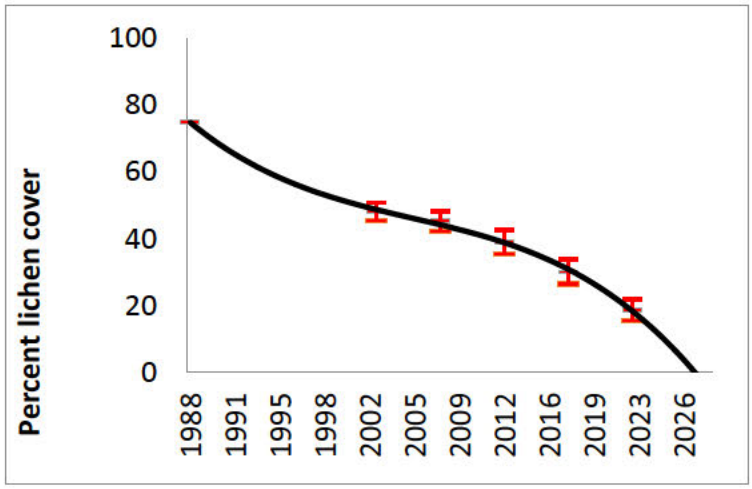


Figure 3. Change in percent cover of lichen on the Nushagak Peninsula from 2002-2022, backcast to 1988 at which time caribou were introduced and forecast to the date at which cover reaches 0, assuming the current rate of change continues. Error bars are 95% confidence limits around percent lichen cover.

The NPCH is smaller in population size and range than the MCH, but almost identical in average population density (Fig 4, data available in Appendix).

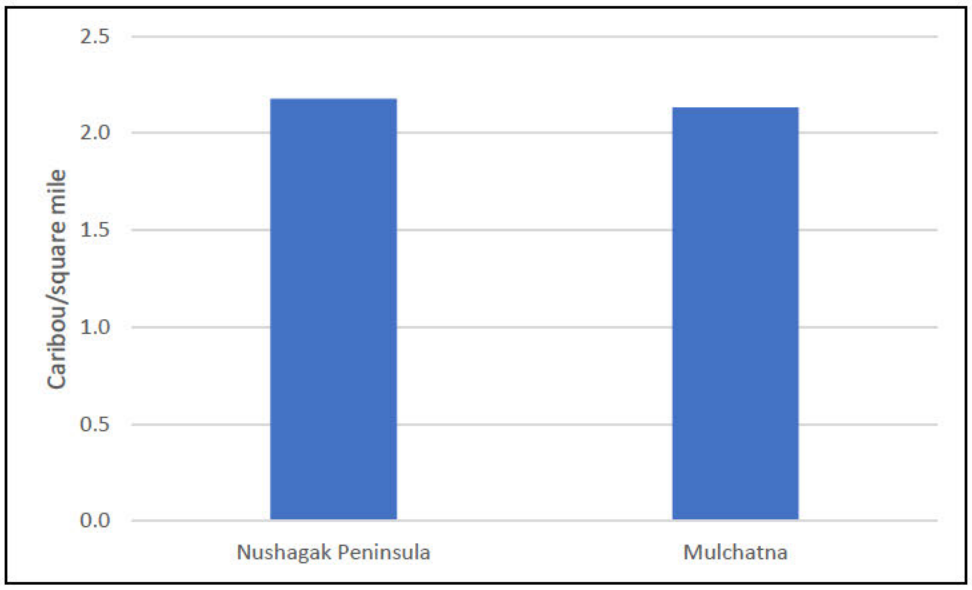


Figure 4. Average population density (caribou/mi^2) of Nushagak Peninsula and Mulchatna Caribou Herds, 1994-2019.

Given the slow growth of lichen, cumulative grazing over time is a meaningful method of assessing grazing impact. Since population density is similar, cumulative caribou grazing years per square mile are also similar between the two herds (Fig. 5). Thus, it is reasonable to believe that winter habitat for MCH is similarly depleted as for NPCH.

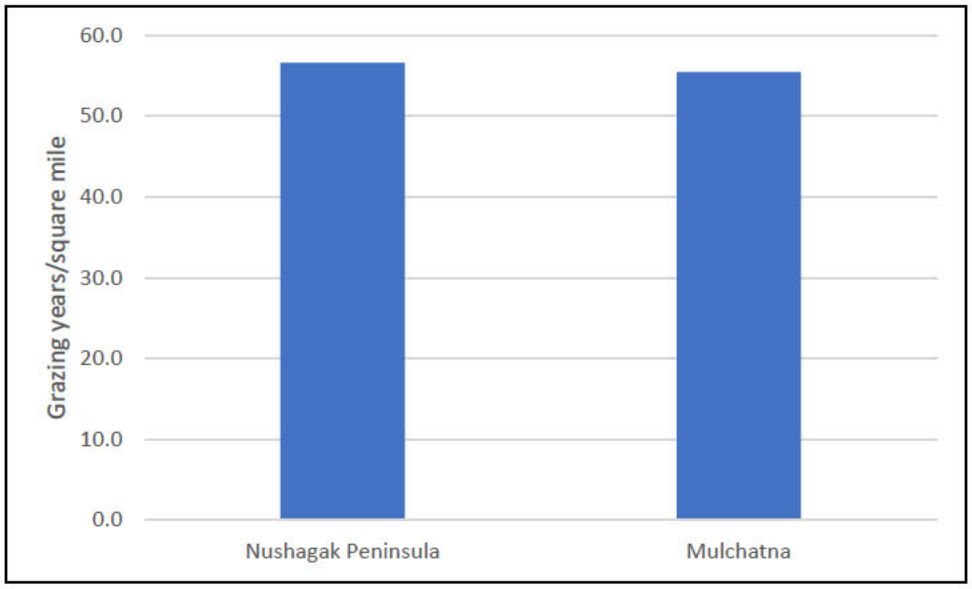


Figure 5. Cumulative caribou grazing years per square mile of Nushagak Peninsula and Mulchatna Caribou Herd ranges, 1994-2019.

Population structure: The current population structure of the Mulchatna Caribou Herd is actually a geographically adjacent collection of multiple separate caribou populations, each of which should be managed independently. ADF&G biologists have recognized this for more than a decade (Woolington 2011), and currently estimate population size separately for four populations (LIchwa and Landsiedel 2024). Thus, objectives should be established separately for each population.

How should population objectives be modified?

There are multiple methods of developing population objectives, foremost of which is to base the objectives on habitat capacity. However, in the absence of a habitat assessment, I offer the following method based on known ecological conditions. The average population estimate prior to the irruption was 14,033. Use this value as the minimum objective and establish the maximum as 3 times the minimum. Apportion these objectives to the independent populations composing the MCH based on current approximate proportions, as such:

Populations within MCH	Minimum objective	Maximum objective
Eastern population	7,000	21,000
Western population	7,000	21,000
Cape Peirce population	400	1,200
Lake Clark population	400	1,200
Combined populations	14,800	44,400

Aderman, A. R. 2020. Lichen utilization and cover monitoring following caribou reintroduction to the Nushagak Peninsula, Southwestern Alaska, 1993-2017.

Lichwa, E. and J. Landsiedel. 2024. 2024 Mulchatna Caribou Herd Photo Survey. Memo to Management Coordinator, Alaska Department of Fish and Game, Dillingham, Alaska.

Woolington, J. D. 2011. Mulchatna caribou herd composition count. Memo to Management Coordinator, file mch11cmp.docx., Alaska Department of Fish and Game, Dillingham, Alaska.

Appendix. Comparison of population density and grazing impact between Mulchatna Caribou Herd (MCH) and Nushagak Peninsula Caribou Herd (NPCH)

Comparison years are 1994-2019, during which time harvest was permitted for both herds. Annual population estimates were extrapolated linearly for years lacking population surveys.

	Population density		Grazing impact	
	MCH	NPCH	MCH	NPCH
Year	Pop	Pop	Grazing years*	Grazing years*
1994	175000	1061	175000	1061
1995	175000	1116	175000	1116
1996	200000	1046	200000	1046
1997	187500	1135.5	187500	1135.5
1998	187500	1225	187500	1225
1999	175000	1139	175000	1139
2000	161000	1053	161000	1053
2001	161000	968	161000	968
2002	147000	741	147000	741
2003	116000	685	116000	685
2004	85000	629	85000	629
2005	65000	620	65000	620
2006	45000	589	45000	589
2007	37500	541	37500	541
2008	30000	683	30000	683
2009	24154	861	24154	861
2010	24154	758	24154	758
2011	24154	847	24154	847
2012	24154	925	24154	925
2013	18308	1033	18308	1033
2014	26275	1100	26275	1100
2015	30736	1424	30736	1424
2016	27242	1294	27242	1294
2017	20292	968	20292	968
2018	20292	787	20292	787
2019	13342	822	13342	822
Total grazing years			2200603	24051

*A grazing year is the grazing impact from one caribou for one year. Unlike the grazing of vascular plants, grazing impact on lichen is accumulative, given its rate of regrowth.

Population differences

	Area mi2	Cumulative pop	years	caribou/mi2/year
Nushagak Peninsula	425	24050.5	26	**2.2**
Mulchatna	39,683	2200603	26	**2.1**
Conclusion:	Population density has been similar between herds from 1994-2019.			

Grazing impact differences

	Area mi2	Grazing years	Grazing years/area m2
Nushagak Peninsula	425	24050.5	**56.6**
Mulchatna	39,683	2200603	**55.5**
Conclusion:	As with population density, total grazing impact has been similar between herds.		

Note: this document is available as an editable Excel spreadsheet.

PC286

Name: Paul Warta

Community of Residence: Anchorage

Comment:

I support proposal 76 to align brown and black bear hunting regulations and as it pertains to aerial take. Especially in light of the reduced moose populations and current intensive management, allowing individuals to more easily hunt bears is desirable.

I strongly support Proposal 80 because it will provide useful management data for the board and ADFG, and we are woefully unaware of the current harvest of beaver in unit 16. It would necessitate more effort on the part of trappers, but due to the importance of beavers to our ecosystem, it is important to know how many are being taken.

I strongly oppose Proposal 81 because would create significant enforcement issues, and would massively increase effort and cost for trappers. Further, two miles away from any maintained road is almost all of unit 14A. Additionally, the proposal does not make any allowance for killing traps, such as snares or body grip traps, which would be a more reasonable way to limit suffering.

I support Proposal 82 as it would create a list of trails that would be easy for the board to adjust in the future as necessary to adapt to a developing area. Although this will likely create a continual stream of proposals, it will also allow the public to weigh in on where we want trapping to be a primary use for the area, and where we want to limit trapping in the interest of other use groups. I was one of the people who attended the working group that addressed this proposal last cycle, and although I do not believe anyone was truly happy with the compromise, I think that it represents a reasonable balance,

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PC287

Name: Brian Watkins

Community of Residence: Eagle River

Comment:

55- Please focus that dg720 is not an extension of tags or seasons, but separating tags out.

PC288

Name: Lindsey Watson

Community of Residence: Winnipeg, MB

Comment:

I oppose Proposal 75, in order to protect wolves and bears.

I Support Proposal 11, which would shorten the brown bear hunting season near Katmai.

PC289

Name: Martha Wavrin

Community of Residence: Henderson

Comment:

OPPOSE Proposal 75. This proposal uses outdated and unproven theories of wildlife "management". Current studies do not show a relationship between lower predator numbers and higher moose counts. Trying to achieve lower predator numbers with aerial hunting is viewed by most humans in 2024 as barbaric. In other words, this is an outdated management proposal.

SUPPORT Proposal 82. My dogs are family. They are also smart athletes who compete in multiple dog sports, including scent work, agility, and Fast Cat. They also sleep in my house and in my bed. They are my hiking and skiing companions who don't recognize what a trap is. Would you want your family member caught in a trap!?

SUPPORT Proposal 11. Why create more conflict?

SUPPORT Proposal 29. Again, let current science reign. Using outdated and unproven theories of wildlife "management" as reasons to lower predator numbers is reprehensible.

PC290

Name: Amy Weatherford

Community of Residence: United States

Comment:

I support proposals that promote conservation and am strongly opposed to those which allow for longer hunting seasons, increased baiting, and hunting using cellular cameras and aerial gunning. In particular, I wish to note the following proposals:

Proposal 75 --the barbarity of the proposal aside, this proposal harkens back to outdated management concepts.

I support proposals such as proposal 11 and 18 to shorten bear seasons and oppose proposals such as 2, 3, and 12-17. 32 is especially egregious. Every species should have a resting period, and no species should be at risk while denning.

I strongly oppose all aerial hunting, such as proposals 33 and 34.

I strongly oppose all increases to bag limits for bears such as proposal 57 and oppose proposals which aim to reduce to wolf population such as 58.

The Board of Game's primary responsibility is the conservation and development of Alaska's wildlife resources. I hope that responsibility will be taken seriously and that proposals which threaten species such as bears and wolves are rejected.

PC291

Name: Adam Welch

Community of Residence: Peters Creek

Comment:

I agree with proposal 3. It will also increase hunter safety in the event that there is a bear on your bait as you walk in.

PC292

Name: Heather Wells

Community of Residence: Wasilla

Comment:

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69, 82

NAME: Heather Wells DATE:12/27/2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all

animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should CEASE until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allowed to hunt caribou. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease. Nonresidents should NOT be allowed to hunt caribou, nor anyone other than indigenous people specifically using it as a food source, not a trophy.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou hunting laws need to be modified for the protection of the species. Population numbers have crashed in all but 2 areas. We suggest NO hunting for at least the next 5 years until numbers rebound, and certainly no hunting allowed for non-residents.

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67

Increasing moose hunting at the current levels is bad enough, introducing NEW hunting seasons and handing out more permits will only make the situation worse.

Support with Amendment 65, 68, 69

If you are going to persist in allowing people to hunt moose, then yes, decrease the number of permits, lower the bag limit, and shorten the season. Frankly, for both caribou and moose, if anyone should be allowed to hunt them at all, it should be only the indigenous local population, who will use any animal killed as a major food source for themselves and their families. Trophy hunting is a disgraceful waste of a very limited natural resource, one which can save lives in the harsh Arctic.

OPPOSE Proposals 70 to 81, 83, 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

Support with Amendment 82: There should be NO traps anywhere where children, dogs, or ordinary citizens would be walking. Remove, or increase the distance from the sides of the roads/rights of way.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a future where Alaska's wildlife can thrive.

Thank you for listening.

NAME Heather Wells

ADDRESS [redacted], Big Lake, Alaska 99652

PC293

Name: Dennis Williams

Community of Residence: Dillingham

Comment:

Proposal 33

I am the proponent of proposal 33. I have recently found out that the addition of wolves to the same day airborne proposal is not allowed under state statue unless through an active predator control program.

We have an over abundance of brown bears in Unit 17 and same day airborne land and shoot would offer increased opportunities to harvest brown bears.

Brown bears eat a lot of moose and caribou calves and we should offer increased opportunity to help decrease predation and capitalize on the many bears here.

Additionally I support proposal 34 but for residents and non residents.

PC294

Name: Danielle Williams, N/A

Community of Residence: Anchorage

Comment:

Alaska Board of Game Members:

I am a 30-year Alaska resident who has spent a lot of time recreating on trails in the Palmer area with my dogs completely unaware, until the past few years, of how close we all might have been to traps. This is why I'm writing to SUPPORT Proposal 82 which requests 50-yard trap setbacks on specific heavily used recreational trails in Unit 14 near Palmer. I understand that the details in this proposal were determined based on consensus between stakeholder groups representing trappers, representatives from Alaska Wildlife Alliance and non-trapper trail users. I appreciate the groups convening in good faith to find a reasonable compromise to this challenge.

This issue has hit close to home for me when it impacted friends on two different occasions in the past couple of years, though I recognize these were both technically outside the scope of this proposal. A

friend's beloved family dog was caught in a snare on a popular Mat-Su area trail—gratefully this friend had a tool and the knowledge to release her. My other friend's family dog died tragically in a conibear trap near a trailhead on the Kenai—a painful loss for our community.

I strongly encourage you to SUPPORT Proposal 82 to reduce incidental trapping accidents like these. I hope to see more compromise proposals like this in the future, as well as improved signage to alert trail users to traps in the area and increased awareness among dog owners of the current dangers of traps at trailheads and in other heavily used recreational areas.

Thank you for your time and for considering my comments.

Danielle Williams

PC295

Name: Danielle Williams, N/A

Community of Residence: Anchorage

Comment:

Alaska Board of Game Members:

I am a 30-year Alaska resident and I'm writing to:

1) SUPPORT Proposal 29 - Mulchatna Caribou Herd Population Review.

I have been reading with great concern in the past two years about how the State has been managing the unfortunate decline of the Mulchatna Caribou Herd by killing large numbers of bears and wolves—despite little/no evidence that this type of Intensive Management strategy works to recover struggling moose and caribou populations for the longterm—and without seeking public input in the Board of Game decision-making process. I support Proposal 29 which seeks a review of the population and harvest objectives for the Mulchatna Caribou Herd. Hopefully, the result of this will be more information to inform science-based decisions that might help the herd recover within reason, while also protecting bears and wolves.

2) OPPOSE Proposal 75 - Aerial Gunning Outside of Denali.

I oppose Proposal 75 for similar reasons noted above, including that killing large numbers of bears and wolves is not shown to increase moose harvest and that the sound science to support this proposal is not there. I also understand that if approved, this proposal would give the State full reign to implement an aerial gunning plan in Unit 16 and that once this is approved, ADFG has the authority to develop an Operational Plan that is no longer open to public comment.

Thank you for your time and for considering my comments.

Danielle Williams

PC296

Name: Jacob Williams

Community of Residence: Anchorage

Comment:

75,76 I support. In the past we have had same day airborne Black Bear permits and it really helped out the moose population. Since the end of that I have personally noticed the lack of moose in the area of Beluga lake and Mt. Sue.

PC297

Name: Kinsey Wilson

Community of Residence: Fayetteville County

Comment:

75: My biggest objection would be the blatant unnatural elimination to wildlife. The bears are a beautiful population that people travel just to have a distant, safe encounter with. The great Smokey mountains have thousands of people visit just to spot a furry friend. This is not only good for agriculture but for the education of generations. Why start a possibly dire chain reaction that is something that could affect our children and our children's children.

Why create a situation when we have invaded and populated beautiful nature areas…

I oppose all 2,9,12,13,14,15,16,17,32,34,57,70,71,76,75,77 for these reasons stated above. Population control should not be intervened by the government.

Written Responses to the proposals of the ADFG

OPPOSING ALL except

Support with amendment, 5, 6 7, 10, 18, 19, 20, 29, 65, 68, 69

NAME: Ceri Sian Wiltshire DATE: 12/18/2024

I am writing in response to the recent proposals made by the Alaska Department of Fish and Game (ADFG). Many of these proposals would harm Alaska's wildlife and disrupt the natural balance of its ecosystems. Alaska is one of the last great wilderness areas in the United States, and people travel from all over the world to see its incredible animals in their natural habitats. These animals are worth far more alive than as trophies.

Although I live in England I and my family are avid followers of the wildlife in Alaska, in particular Katmai National Park and the bears of Brooks Falls. I am aware via social media of the millions of people who follow along just like me and of the many thousands of people who visit as eco tourists. The community who value these animals is global. I certainly hope to see them for myself one day.

Encouraging overhunting may bring short-term profits, but it risks long-term devastation. Overhunting key species—like brown bears, caribou, and moose—will disrupt the food web and make it harder for all animals to survive. Tourists will stop coming if there are no animals to see, and ecosystems will struggle to recover. Protecting wildlife is better for Alaska's environment and economy in the long run. In fact I sincerely believe that overhunting risks not only destroying the ecosystem in Alaska but have a cumulative effect on the environment globally.

Below, I have addressed each proposal in numerical order to explain why they are unsustainable and dangerous.

OPPOSE Proposal 1: Reauthorize the brown bear tag fee exemptions

Allowing hunters to kill bears without paying a fee reduces the money needed to protect wildlife and keep populations healthy. Bears reproduce slowly—only every 4 to 6 years—so overhunting could wipe them out. Protecting bears is better for Alaska's economy because tourists come to see them alive, not dead.

OPPOSE Proposal 2: Open two bear baiting seasons

Baiting bears with food teaches them to rely on human handouts, which makes them more likely to get into dangerous conflicts with people. It's not fair or natural to trick animals like this, and killing bears that are just trying to survive harms the entire ecosystem.

OPPOSE Proposal 3: Allow the use of cellular cameras for bear hunting over bait

Using high-tech cameras to hunt bears gives hunters an unfair advantage and disrupts wildlife by bringing too many people into sensitive habitats. This kind of hunting is more about gadgets than skill and puts too much pressure on bear populations that are already struggling.

OPPOSE Proposal 4: Establish general season, archery-only sheep hunts

Sheep are an important part of mountain ecosystems. Overhunting them would force predators like bears to find food elsewhere, which can lead to more conflicts with humans. It's better to let nature manage itself than to risk upsetting the balance.

SUPPORT WITH AMENDMENT Proposal 5: Reduce the nonresident bag limit for caribou

While limiting caribou hunting seems like a good idea, it could make hunters shift their focus to other animals, like bears or moose. Caribou can have babies every year, but bears reproduce much more slowly, so we need to protect them more. Having said that, there are indications some populations are collapsing due to human activity, so all hunting should cease until such time as reasons for this are made clear through scientific facts and studies. Nonresidents should not be allowed to hunt caribou.

SUPPORT WITH AMENDMENT Proposal 6: Shorten the nonresident caribou hunting season

Shortening the hunting season might reduce pressure on caribou, but it could increase hunting of other animals, like bears, which are already at risk. Hunting should stop given collapses in most populations. Nonresidents should not be allow to hunt caribou.

SUPPORT WITH AMENDMENT Proposal 7: Extend the caribou hunting season

Extending the hunting season disturbs not only caribou but also the bears and wolves that rely on them for food. This hurts the entire ecosystem and makes it harder for wildlife to recover. With studies showing collapse in all of the populations, all hunting should cease.

OPPOSE Proposal 8: Clarify hunting feral reindeer on Umnak Island

Even though reindeer aren't native, allowing hunting could disturb the island's natural balance. The ecosystem is better off if nature is left to manage itself.

OPPOSE Proposal 9: Lengthen spring and fall brown bear hunting seasons in Unit 9

Lengthening bear hunting seasons puts too much pressure on bears, which take years to recover because they reproduce so slowly. Bears are crucial for the ecosystem, and overhunting them could cause long-term harm.

Support with Amendment Proposal 10: Close Unit 9A to nonresident brown bear hunting

Closing Unit 9A to nonresident hunters is a good start, but stopping all brown bear hunting would be even better. Bears need protection to keep their population stable.

OPPOSE Proposal 11: Shorten spring and fall brown bear hunting seasons in Unit 9C

Shortening hunting seasons is a positive step, but hunting during critical times—like when bears are getting ready for hibernation—should be stopped entirely to protect cubs and the overall population.

OPPOSE Proposal 12: Lengthen fall brown bear hunting seasons in Units 9D and 9E

Extending the hunting season would overburden bear populations, which can't recover quickly due to their slow reproduction rate. This proposal risks wiping out bears in these areas.

OPPOSE Proposal 13: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Lengthening hunting seasons for everyone would lead to even more overhunting and put bears at greater risk. This harms not only bears but the entire ecosystem they support.

OPPOSE Proposal 14: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

This proposal repeats the problem of overhunting, which can devastate bear populations and destabilize the environment.

OPPOSE Proposal 15: Lengthen nonresident spring brown bear hunting season in Units 9D and 9E

Allowing more time for nonresidents to hunt bears adds extra pressure on populations that are already struggling. Tourists are more likely to visit to see live bears, not hunt them.

OPPOSE Proposal 16: Lengthen fall brown bear hunting seasons in Units 9D and 9E for residents and nonresidents

Expanding the fall hunting season would harm bear populations and hurt the ecosystems that depend on them, including other animals and even plants.

OPPOSE Proposal 17: Lengthen spring and fall brown bear hunting seasons in Unit 9E for residents and nonresidents

Lengthening both spring and fall seasons leaves bears no time to recover and puts cubs at risk. This could wipe out the population in the long term.

Support with Amendment Proposal 18: Shorten spring and fall brown bear hunting seasons in Unit 9C and convert to drawing permits

Shortening hunting seasons and requiring permits is a small improvement, but stopping bear hunting entirely would be much better for their survival and the ecosystem.

Support with Amendment Proposals 19–20: Hunting Arctic fox on the Pribilof Islands

Arctic foxes are key to controlling small animal populations. Overhunting them could lead to a boom in rodents, which would upset the balance of the ecosystem and cause more problems for other animals.

OPPOSE Proposal 21: Remove the two-per-day bag limit for beavers

Beavers create wetlands that many animals rely on, including bears. Overhunting them would destroy habitats and harm the entire ecosystem.

OPPOSE Proposals 22, 35–36: Shorten wolverine hunting and trapping seasons

Protecting wolverines is important because they help clean up the environment. If wolverines are overhunted, it would hurt the whole ecosystem and make life harder for animals like bears.

OPPOSE Proposal 23: Lengthen hunting season for Emperor geese

Emperor geese are an important part of coastal ecosystems. Overhunting them would harm scavengers and predators, including bears, that rely on these areas for food.

OPPOSE Proposal 24: Close the season for Alaska hares

Alaska hares are food for many predators. Protecting them helps keep the food web balanced and ensures survival for animals like bears and wolves.

OPPOSE Proposals 25–27: Various changes to moose hunting in Unit 17A

Hunting too many moose takes away a food source for predators like bears, which could force them into more conflicts with humans.

Support with Amendment Proposal 29 Caribou

OPPOSE Proposals 28, 30, 31: Caribou hunting restrictions in Units 9, 17, and 19

Limiting caribou hunting helps keep their populations stable, which also supports predators like bears and wolves.

OPPOSE Proposal 32: Allow year-round hunting of brown bears

This is one of the worst ideas. Bears can only reproduce every 4 to 6 years, so year-round hunting would quickly wipe them out and destroy the ecosystem.

OPPOSE Proposals 33–34: Allow airborne hunting of bears and wolves

Hunting animals from airplanes is unfair and unethical. It disrupts wildlife and could lead to population crashes that harm the whole environment.

OPPOSE Proposals 37–38: Changes to beaver hunting and sanctuary access

Allowing hunting in sanctuaries defeats their purpose and could destroy important habitats that support many species, including bears. Sanctuaries should be safe spaces for animals.

OPPOSE Proposals 39–45: Various changes to moose hunting in Unit 13

Hunting too many moose removes a key food source for bears and other predators, leading to ecosystem imbalance and possible conflicts with humans.

OPPOSE Proposals 46–50: Hunting caribou and sheep in Units 11 and 13

Caribou and sheep are critical prey for predators. Overhunting them forces bears and wolves to look elsewhere for food, upsetting nature's balance.

OPPOSE Proposals 51–56: Hunting sheep and goats

Hunting sheep and goats takes away food that predators like bears and wolves depend on. Letting these animals live naturally keeps the ecosystem balanced.

OPPOSE Proposal 57: Increase the bag limit for brown bears

Letting hunters kill more bears is a terrible idea. Bears already reproduce slowly, so overhunting could cause their numbers to crash and harm the entire ecosystem.

OPPOSE Proposals 58–59: Changes to wolf population management

Wolves keep small animal populations under control. Without them, rodents and other small mammals could overrun the area, causing even more problems.

OPPOSE Proposals 60–63: Changes to ptarmigan hunting

Ptarmigan are food for many predators, including bears. Overhunting them would disrupt the food web and make survival harder for larger animals.

OPPOSE Proposals 64, 66, 67,

Support with Amendment 65, 68, 69

OPPOSE Proposals 70 to 84: Expanding hunting and trapping seasons

Expanding hunting and trapping seasons puts too much pressure on wildlife and takes away resources from predators like bears. This harms the balance of the ecosystem and makes it harder for all animals to survive.

In Conclusion:

Almost all of these proposals harm wildlife and Alaska's environment. Protecting animals and promoting eco-tourism is better for the state's economy and ensures a

future where Alaska's wildlife can thrive. I will be waiting and hoping that these animals and the unique Alaskan environment they live in will receive more protection from the ADFG and be actively cared for and preserved for the future,

Thank you for listening

Ceri Sian Wiltshire

[redacted]

Solihull

West Midlands

England

B912SB

WOLF CONSERVATION CENTER
www.nywolf.org

December 27, 2024

Alaska Board of Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

To: Alaska Board of Game

Thank you for the opportunity to provide public comment on the various proposals. On behalf of the Wolf Conservation Center and our 800+ Alaska members, we ask you to oppose proposals that would create more opportunities to kill wolves – namely, proposals 33, 59, 75, and 79.

Wolves are valued members of Alaska's ecosystems and generate millions of dollars in tourism revenue for the state, but these proposals would allow for the continuation of scientifically unsound predator control programs and would allow for increased sport and trophy killing of wolves.

Proposal 75 is the most egregious of the wolf-specific proposals and we oppose it for several reasons. The proposal would allow Alaska Department of Fish and Game (ADFG) to establish yet another predator killing program, this time between Denali National Park and Lake Clark National Park and Preserve, in a misguided effort to boost ungulate numbers. Studies have shown that Alaska's predator control programs do not increase human moose harvest and this proposal would decimate the wolf population by 73-80% (bears would also be targeted in significant numbers). ADFG can better understand predator-prey relationships and external impacts on ungulate populations but is instead relying on outdated management methods that do not work and instead exacerbate wolf mortalities[1][2].

The proposal would also greatly impact wildlife viewing opportunities in the bordering National Parks. In 2023, the index of wolf viewing for the eastern portion of the road was 0.01; only 2 data collection trips out of 135 observed a wolf[3] . Wolves that reside within Denali, and all

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[1] Cassidy, Brenna & Smith, Douglas & Cassidy, Kira & Stahler, Daniel & Hebblewhite, Mark. (2024). Harvest of transboundary grey wolves from Yellowstone National Park is largely additive. Journal of Applied Ecology. 61. 2180-2193. 10.1111/1365-2664.14720.

[2] Ripple WJ, Miller SD, Schoen JW, Rabinowitch SP (2019) Large carnivores under assault in Alaska. PLOS Biology 17(1): e3000090. https://doi.org/10.1371/journal.pbio.3000090

[3] U.S. Department of the Interior, National Park Service, 2023 Denali Annual Wolf Report

national parks, are subject to the non-impairment clause; a decrease in wolf sightings in Denali suggests that increased killing of wolves outside of the park is impairing the park's resources.

Intensive management and predator control programs are currently underway in Units 13 and 17, which neighbor Unit 16. Moose populations have met objectives so allowing for the removal of up to 113 wolves under the guise of boosting moose numbers could damage ADFG's reputation – a reputation that has already taken a hit after aerially killing nearly 200 bears in southwestern Alaska.

Implementing this proposal would drain valuable funds, as intensive management programs are not funded by the Pittman-Robertson Act and would go against the desires of many Alaskans and the millions of tourists who visit the state each year with hopes to see wolves. We urge you to oppose Proposal 75 and to oppose Proposals 33, 59, and 79, all of which aim to increase the killing of wolves.

We appreciate the opportunity to comment and offer these comments with shared interest in the health and longevity of Alaska's wolf population.

Sincerely,

Regan Downey

Regan Downey
Director of Education, Wolf Conservation Center
South Salem, NY 10590
regan@nywolf.org

PC300

Name: Alisa Wong

Community of Residence: Virginia

Comment:

Oppose 75

Studies have shown that Alaska's predator control programs — aimed at boosting moose, caribou, and deer populations for hunters — do not increase human moose harvest.

Large carnivore management in Alaska is a reversion to outdated management concepts and occurs without effective monitoring programs designed to scientifically evaluate impacts on predator populations or identify causal relationships between predator control and pre-population dynamics.

If approved, this proposal would give ADFG full reign to implement an aerial gunning plan in Unit 16. Once a proposal like this is approved, ADFG has the authority to develop an Operational Plan for aerial gunning that is not open to public comment.

Support 82

Trapping setbacks are popular, easy to put in place, and seem to work; they have been successful in Unit 1C in Juneau and in the Anchorage municipality.

The setback distance is small enough to not significantly reduce the BOG's ability to manage wildlife.

Trapping setbacks on these popular trails would help reduce incidental trap encounters with recreationists and their dogs.

Support 11

With the early season hunt, operators were still dropping off sport fishermen and wildlife viewers on rivers where bear hunting was taking place. Hunting camps and hunters were occupying critical habitats where bears were fishing, forcing other users to avoid these areas.

Bears were shot right at the outlet of the Kulik River. The Kulik Lodge had employees breaking down camp, there were several groups of sport fishermen on the river as well as wildlife viewers. A bear had cached a hunter-shot carcass right at the outlet of the Kulik River where aircraft picked up sport fishermen and other visitors.

This proposal would restore the hunting season to the pre-2022 length and would reduce human-wildlife conflicts.

Support 29

The Mulchatna caribou herd has changed continuously from the time monitoring began. The current population objective (30,000-80,000) was established in 2008 at which point the population was estimated to be 30,000. This objective has been achieved only once since then.

Habitat quality has likely changed since the last population objective was established, and a new review should take this into consideration as it has almost certainly reduced population potential.

A review of the population and harvest objective for the MCH would provide valuable data to inform game management and the Mulchatna Predator Control Program.

PC301

Name: April Woods

Community of Residence: Anchorage, Alaska

Comment:

I grew up in Alaska; as I child, teenager and young adult I use to see moose daily and porcupines, mountain sheep, and beluga whales all the time. Now I do NOT. That means you failed at your job to protect them. I also know our bear numbers and wolf numbers are way low. This is proof that the State of Alaska's wildlife management is a complete failure, they all should be fired and publicly shamed for their poor outcomes.

I oppose the obvious and stupid idea in Proposal 75 of Aerial Gunning Outside of Denali, I think it should not happen anywhere on the planet.

I support Proposal 82 to increase Palmer Trapping Setbacks: Personally I would ban all trapping but caring for life is asking too much for the idiots who run this State.

I support Proposal 11 to shortened Brown Bear Seasons Near Katmai: Again I would ban it outright. A caring State would, but we don't have that.

I support Proposal 29 a Mulchatna Caribou Herd Population Review.

I care for the life of wildlife, not for the corruption the Board of Game does selling our wildlife for money, it is wrong, it is evil, and it leads to the results we have - declining wildlife numbers - until they go into extinction and then all humanity will follow, that is the direction you fools take us to.

Judge the Board of Game on our wildlife numbers, which are way low, thanks to their corruption, evil, their wrong and their failure. They get No Respect from me.

Wrangell-St. Elias National Park
Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

October 10, 2024

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

Subject: Comments on Central and Southwest Region Proposals

Dear Board of Game Members:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 4 and 5, 2024. The Commission is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. At the meeting, the Commission reviewed proposals to be considered at the Board's Central and Southwest Region meeting.

Proposal 4: Establish general season, archery only sheep hunts in Units 9, 11, 13, 14A, and 14;
Proposal 45: Add a five-day archery only season for hunting moose in Unit 13; and
Proposal 56: Establish an archery only registration goat hunt in Units 13D and 11:
The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposals 4, 45, and 56, which would all establish archery-only hunts for sheep, moose, and goat. Existing hunts provide adequate opportunity. The landscape is large and bow hunters have plenty of opportunities to hunt in places in places where the rifle hunters don't go. Additionally, a specific concern regarding Proposal 4 is that the dates are in the middle of the summer, which isn't viable from a meat care standpoint when it is hot and someone is in the mountains above tree-line where there is no shade. A hunter wouldn't be able to keep meat from spoiling that time of year in a backpack.

Proposal 49: Eliminate the harvest of Nelchina caribou. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposal 49. The Commission is very concerned about the Nelchina caribou herd and want the caribou to be protected until it recovers.

Proposal 59: Lengthen wolf trapping season in Unit 11. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposal 59, which it submitted.

Chair: Sue Entsminger; Members: Nathan Brown, Bruce Ervin, Daryl James, Mercedes Knighten, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, and Daniel E. Stevens

Wolf trapping is a customary and traditional activity, and increasing the wolf harvest opportunity may help address predation issues on moose, caribou, and sheep.

Proposal 60: Lengthen coyote trapping season in Unit 11. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposal 60, which it submitted. Trapping is a customary and traditional activity, which could help address concerns about high coyote numbers and predation issues on important subsistence species.

Thank you for considering our comments.

Sincerely,

Susan L. Entsminger

Susan L. Entsminger
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Sue Entsminger; Members: Nathan Brown, Bruce Ervin, Daryl James, Mercedes Knighten, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, and Daniel E. Stevens

PC303

Name: Ann Yates

Community of Residence: Anchorage AK

Comment:

I am opposed to Prop 75 and can't imagine how we can legitimately and ethically shoot and kill living beings, in this case bears, who are doing nothing to endanger or harm anyone or anything. We have enough knowledge now to know that bears and wolves, like humans, have intelligent and emotional lives, can feel and suffer, and bond with their offspring and relatives. It is especially horrible that we would do this in the name of trying to increase a caribou herd which has not been proven to increase from this killing. Let's move on from ignorant and destructive actions that do not help any beings. I also support Prop 29 to scientifically and clearly evaluate the Mulchatna Caribou herd population instead of acting from ignorant and blind opinions.

PC304

Name: Pamela Youngquist

Community of Residence: Juneau

Comment:

Pamela Youngquist

I am submitting comment to share my deep concerns and opposition to Proposal 75 and my enthusiastic support of Proposals 11, 29 and 82.

If approved, Proposal 75 would give ADFG full reign to implement an aerial gunning plan in Unit 16. Once a proposal like this is approved, ADFG has the authority to develop an Operational Plan for aerial gunning that is not open to public comment.

Large carnivore management in Alaska is a reversion to outdated management concepts and occurs without effective monitoring programs designed to scientifically evaluate impacts on predator populations or identify causal relationships between predator control and pre-population dynamics. Studies have shown that the proposed predator control program does not increase human moose harvests, the purported purpose for enacting such extreme predator reduction methods by ADFG.

Proposal 11 would restore the hunting season to the pre-2022 length and would reduce human-wildlife conflicts, examples of which each of you are well aware of and their detrimental results for both people and bears.

Proposal 29 rightly calls for review of the population and harvest objectives of the Mulchatna Caribou Herd (MCH) in Unit 17 which has changed continuously since monitoring began. The current population objective (30,000-80,000) was established in 2008. The population was estimated to be 30,000 back then and the objective has only been achieved once since then. Habitat quality has likely changed since the last

population objective was established, and a new review should take this into consideration as it has almost certainly reduced population potential.

Proposal 82 regarding trapping setbacks in Palmer, Game Management Unit 14 are a good idea. They are generally popular with the public, basically effortless to put in place, and work when placed correctly. They have been successful in Unit 1C in Juneau and in the Anchorage municipality. Additionally setbacks on these popular trails would help reduce incidental trap encounters with people recreating, as well as their dogs.

Thank your for including citizens as stakeholders in your decision making process.

December 26, 2024

Re: Board of Game proposals for Central/Southwest Region

To the Board:
I live in Chickaloon, in GMU 14B. I am providing the following comments on some of the Board of Game (BOG) proposals for 2025. Thank you for considering these comments.
Kendra Zamzow
[redacted]
Chickaloon, AK 99674

Proposal 46

I support this proposal. I support the concept of the community hunt, but not if urban hunters participate to the point that they overwhelm communities. I fully support focusing on non-motorized hunting to reduce the number of urban hunters.

Proposal 49

I support the proposal to eliminate the Nelchina hunt for six years or until the midpoint of the management objective, and to include GMU areas the Nelchina herd moves into. This would be a hardship on subsistence hunters for a short term, however it would provide time to determine the potential impacts of climate and wildfire on the herd, and whether we are facing more than a normal "boom and bust cycle". Note that in 2006, the BOG expanded predator control in GMU 16B into GMU 16A to target wolves travelling between units and provide additional protection to moose on the border of the units; similarly, eliminating human hunting in GMUs used by the Nelchina herd until they have reached a solidly healthy level will provide additional protection to build the herd.

Proposal 64

I oppose Proposal 64 because it continues to allow the killing of cows accompanied by calves. Only in GMU 14 is allowed across the entire unit, rather than limited to a small area or limited to takes with specific weapons such as muzzle loaders. There has been a strong reaction against this practice in both the Sutton and the Chickaloon Community Councils. Although ADFG considers this a tool to reduce the moose population (e.g. if the cow is killed, the calf often dies as well, reducing moose by two with one shot), many people in the communities in GMU 14 object to the practice.

Proposal 75

I oppose this proposal in its current form.

By law (Intensive Management 1994), the BOG must manage predator and prey populations for sustained harvest. The key questions relevant to BOG Proposal 75 are: have moose populations declined below management objectives in GMU 16, will culling wolves result in higher moose populations, and at what cost?

There was no information about moose population trends in recent years in the BOG 2025 handbook, nor was it readily available from the ADFG website. This information could strengthen the argument of the

need for predator control.

The success of predator control in achieving higher moose populations (or, in the lower 48, elk populations) are be mixed. A study in 1997 determined that to increase moose populations, culling wolves would need to occur over a large area for at least four years, and that only might increase moose in the short-term, or not at all. In 2017, an ADFG report noted that "As long as Unit 16B remains under intensive management, additional information will be needed to better understand the predator-prey dynamics of the unit" (Peltier, 2017) – has that been done? A very recent study determined that wolf culling was unlikely to result in an increase in moose populations. Analysis of nearly 4 decades of harvest data from GMU 13 showed no positive correlation between killing wolves and subsequent moose harvests, and moose harvests were not positively correlated with previous years' wolf harvests for any time lag examined. In fact, there was a weak negative correlation between moose harvest and the previous year's wolf harvest. In 2025, ADFG is proposing to reduce the moose harvest to one that is more biologically appropriate (Proposal 39).

Focusing solely on predator control oversimplifies the issue. Predator-prey relationships are complex, and other factors like habitat and browse quality and winter severity can significantly impact moose populations. Has ADFG identified the links between pressures on moose populations - including habitat extent, browse nutritional quality, deep snow years, high summer heat years, and moose migration northwards, as well as pressure from predation – in order to ensure that moose populations in GMU 16 will increase in the short- and long-term to satisfy the needs of hunters?

It appears that ADFG is using twinning rates as a substitute for actual data on habitat and nutritional quality of browse. However, there is no information readily available about the twinning rates of moose in GMU 16. Habitat improvement efforts, such as controlled burns to promote early successional vegetation for moose browse, may be more effective long-term strategies but have not been implemented at meaningful scales in Alaska. Controlled burns or selective logging could have the added benefit of reducing large-scale wildfire danger for communities. Unit 16 is the area west of the Susitna, which is currently being promoted as an area for forestry and agriculture – this type of land clearing tends to increase moose browse.

Wolves primarily select older, weaker moose, including prime-aged moose with arthritis. By doing so, they leave healthier moose available for breeding and for the hunting population. Wolves and bears also select calves. In years with deep snow, more of the moose population dies, particularly the calves. Predation on calves during high snow years is unlikely to result in much change in the overall moose populations available for hunters.

Deep snow affects moose in multiple ways and there are documented effects of snow impacts on moose populations in GMU 16. In deep snow, moose burn more calories trying to move around, therefore they need more calories at the same time when it is harder to find browse; they move onto highways, snowmachine trails, and railroad tracks where they are more likely to be hit; and they are more susceptible to wolves who can more easily travel over the snow. Can ADFG provide research or information linking moose populations, wolf populations, and deep snow years; and in particular whether it was lack of nutrition or higher susceptibility to wolf predation that was the primary factor in causing

stress on moose populations? Are there moose populations that move between GMU 13, 14, and 16 – some of which have been subject to high rates of moose kill from the railroad or have been subject to targeted hunts clearing moose from highway areas or, in GMU 14, have allowed cows with calves to be killed, frequently leaving the too-young calves to die? That is, are regulations in other GMUs potentially impacting populations in GMU 16, particularly as moose are moving north due to changes in vegetation resulting from climate change.

While decreasing the wolf population may – or may not – have a short-term impact on moose populations, the larger ecosystem effects of habitat and weather will remain, and continue to cause fluctuations in populations.

What is the cost of engaging in heavy predator control, year after year? What is the cost if predator control expands to include bears as well as wolves? Funding has been cut, at a time when ADFG is facing complex issues in fisheries (e.g. federal management of salmon fishing in parts of Cook Inlet) and lack of funding for weirs and research around severe declines in Chinook across the state and coho in the Susitna basin. Is predator control in GMU 16 a financial priority? What will be cut so this new program can be funded?

Given the factors that contribute to moose populations and fluxes in populations, I oppose Proposal 79 and would prefer that ADFG first determine if prescribed burns or selective logging could increase habitat; that ADFG use funding to determine cause and effect links through science-based studies to ensure that actions such as culling predators will have the desired effect of increasing moose populations, or whether the moose harvest objective should be reduced as they are proposing for GMU 13; that ADFG not engage in culling predators near areas such as National Parks; and that if predator control goes into effect, that they focus on calving areas to increase the survival of calves in low snow years.

Resources for comments on Proposal 75:

Hoy, SR, JA Vucetich, and RO Peterson. 2022. The role of volves in regulating a chronic non-communicable disease, osteoarthritis, in prey populations. *Frontiers in Ecology and Evolution. 10:819137*

McNay, M and J Ver Hoef. 2001. Predation by a regulated wolf population on moose and caribou. ADFG Division of Wildlife Conservation, Federal Aid in Wildlife Restoration Research Progress Report 1 July 2000-30 June 2001.

Miller, SD, DK Person, and RT Bowyer. 2022. Efficacy of killing large carnivores to enhance moose harvests: new insights from a long-term view. *Diversity (14), 939.*

National Research Council. 1997. *Wolves, bears, and their prey in Alaska: biological and social challenges in wildlife management.* Washington, DC. The National Academies Press. https://doi.org/10.17226/5791

Peltier, TC. 2017. Moose management report and plan, Game Management Units 16A and 16B: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. ADFG, Species Management Report and Plan ADF&G/DWC/SMR&P- 2017-7, Juneau.

Proposal 82

I support this proposal. I formerly trapped marten, ermine, wolverine and beaver in an area outside the MSB. We used conibear traps, which would be deadly to a dog as easily as to the targeted species. We kept our traps well off of trails. This is a small effort on the part of trappers to co-exist with the many other users on public lands.

PC306

Name: Tracie Zermeno

Community of Residence: Miami

Comment:

#74

I oppose the killing of bears & wolves!! Absolutely horrific decision!!!