

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

January 2, 2026

Dear Chairman and members of the Board:

On behalf of over 1200 members of the Alaska Trapper's Association, I wish to share our opinion on specific proposals that you will be considering at your January Southeast Region meeting.

Proposal #9 would establish hunting and trapping regulations for taking of mountain lion in the SE Region. ATA supports this proposal. It would offer additional harvest opportunity and would lead to improved data collection. As long as mountain lion inhabit the region, they should be managed like any other harvestable species.

Proposal #10 would remove the sealing requirement for beaver in Units 1-5. ATA supports this proposal. Unless the Department recognizes specific value to such sealing, it probably doesn't serve a significant useful purpose. Beaver populations appear to be healthy and trapping pressure is modest. The effort required to tag beaver and record data could probably be better spent on other management activities.

Proposal #11 would allow the use of wireless communication cameras for trapping furbearers in Units 1-5. ATA supports this proposal. Such cameras would have no impact on harvest but would notify trappers if there is a catch. That ability would be valuable given the weather and water conditions of SE. It could also be valuable in situations of trap tampering.

Proposal #12 would prohibit the use of night vision devices for taking furbearers in Units 1-5. ATA does not support this proposal. This activity is relatively new, has only recently been adopted statewide, and should be given the chance to work. While trapping should continue to be the primary means of taking furbearers, it offers a manageable opportunity for harvest.

Proposal #13 would prohibit the use of night vision devices for the taking of furbearers in Units 1-5 during the state and federal deer seasons. For the same reasons as with Proposal #12, ATA does not support this proposal. The potential for abuse shouldn't necessarily drive the regulatory process. We are not aware of data indicating that abuse is a significant problem. As such data might become available, the Board could take action to adjust, if deemed necessary in the future. In the mean time, give the night vision process a chance to work.

Proposals #14 and #15 would increase or eliminate the bag limit for fisher in the SE Region. ATA supports these proposals. They would improve the harvest opportunity for a species that appears to be on the increase. Until fisher becomes a significant target animal, they would probably not result in a significant increase in the harvest. Legitimizing the harvest would probably result in more accurate data collection. We leave it up to the wisdom of the Board to decide if they prefer to increase or eliminate the bag limit.

Proposal #16 would shift the duck season in SE to close on January 22. ATA opposes this proposal. It would extend the overlap of the duck hunting season with the wolf trapping season. Both activities tend to frequent the tidal flats in the upper portions of inlets, and hunting dogs are likely to travel the same routes as wolves do. The potential conflict is too apparent.

Proposal #48 would increase the Unit 2 wolf population objectives from 150-200 to 200-300. ATA supports this proposal. It probably better reflects reality. The bottom line is that the wolf population should be

managed to allow for healthy wolf and deer populations. Allowing excessive predation would negatively impact both deer and wolf populations. ATA supports future ADF&G research and hopes that the data will become increasingly reliable.

Proposals #49 and #50 would set the beginning of the wolf trapping season in Unit 2 ahead from the current Nov 15 to the proposed Dec 15 (or Jan 1). ATA supports whichever of these proposals the Board might deem worthy. Such a change in the opening date would reduce potential conflict with other users and would result in the higher quality of the wolf fur harvest.

Proposal #51 appears to insure that the emergency order driven wolf trapping open season on Prince of Wales Island is at least 45 days long. ATA defers to the judgment of the Board in determining the limitations which might be put on the Department in order to achieve the management goals in the Unit.

Proposal #52 would make Unit 2 an area for the intensive management of wolves. This appears to parallel the concept of intensive management of deer to allow adjustment of the wolf population objectives. Regardless of how it is orchestrated, ATA supports the concept. A healthy deer population is vital to the community and wolf management is an integral component in achieving that objective.

Proposal #53 would require an online trapping education course for trapping wolves in Unit 2. ATA does not support such a requirement. It seems progressively bureaucratic and unnecessary. There is no limit to the number of education courses that could be mandated for hunters, trappers and fishermen. The most practical education program involves fitting into the user group, studying information that is already available, and exercising the activity. On a side note, it is the position of ATA that if such a mandate were to be imposed, ATA should be in charge of developing and offering the program, in consultation with ADF&G. We are the acknowledged subject matter experts in this field.

Proposal #54 would require that identification tags be attached to traps and snares in Unit 2. This is a perennial, nuisance proposal. ATA offers the same response that we offered last year in response to a parallel statewide proposal. It would be a nuisance to legitimate trappers and would present a significant opportunity for abuse. It would create a temptation for people to disturb sets. It would also create an opportunity for ill-intentioned people to maliciously move traps and tags around. Irresponsible trappers would not abide by the requirement anyway. ATA encourages trappers in traveled areas to mark traplines. Properly done, that practice eliminates any purpose for marking individual equipment. Our long-term opposition to trap tags is clearly stated in our Position Statement (enclosed), which was adopted in 2015.

Proposal #56 would prohibit the use of night vision devices for taking furbearers during state and federal deer seasons. As we explained regarding Proposal #13, ATA does not support this proposal.

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

Sincerely,



Randall L. Zarnke, president

Alaska Trappers Association Official Position Statement Trap Identification Tags

The Alaska Trappers Association does 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.

We are also concerned about the potential for uneven enforcement throughout the State. Regulations should be enforced equally in all areas.

The Alaska Trappers Association does not support implementation of a regulation requiring identification be attached to all traps and snares.

Adopted this 28th day of April, 2015

ATA President