ALASKA MINERS ASSOCIATION, INC.

3305 Arctic Blvd., #105, Anchorage, Alaska 99503 • (907) 563-9229 • FAX: (907) 563-9225 • www.alaskaminers.org

February 11, 2007

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

FAX 907-465-6094

RECEIVED
FEB 11 2008
BOARDS

Re: Proposal 86, Tangle Lakes Area Wildlife Refuge

Dear Sirs;

On behalf of the Alaska Miners Association I **ask that you reject Proposal 86** which proposes a state wildlife refuge in the Tangle Lakes area north of the Denali Highway.

The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry. The AMA is composed of approximately 1200 individual prospectors, geologists and engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, nickel, coal, limestone, sand and gravel, crushed stone, armor rock, etc. Many of our members have worked for several decades in the area affected by Proposal 86 and many have mining claims there.

This area along the Denali Highway has been a focus of mineral exploration since about 1903. Various placer gold mines have operated in the area and several lode deposits have been identified and explored. This area is known to contain gold, copper, nickel, and platinum mineralization. This area has been a major focus for exploration for many years. During the past decade or more, several million dollars have been spent on air and ground geophysical surveys, rock and soil sampling and analysis, geologic mapping, drilling, etc. More than 30 exploration and/or mining permits have been issued for the area of Proposition 86 and adjacent areas during the past few years.

Because this area is of such high potential for valuable minerals, it was selected by the State of Alaska and was placed on the priority list for transfer to the State. This area now contains more than 250 square miles of mining claims held by various companies and individuals.

Previous mining in the area has improved fish and wildlife habitat. Prior to mining, Valdez Creek fish habitat was limited to spring, summer and early fall for grayling and some other species. In some years Valdez Creek would freeze to the bottom killing all fish because there was no over-wintering water. Final reclamation of the Valdez Creek Mine, which in the mid-1980s was the largest private employer in the Mat-Su Borough, included a large lake with deep fresh water which now provides excellent over-wintering habitat. Prior to this lake the fish in the river had to retreat to the Susitna River during the winter.

COMMENT# 1

There is no need for a refuge to protect wildlife. There are all manner of requirements that a company must follow before they can begin mining and many of these are focused on minimizing the impacts on fish and wildlife. If a mine is eventually proposed for the area, it will require a multi-year permitting process involving the public, state and federal agencies. Alaska has a comprehensive, thorough, mine permitting process which has been utilized in the permitting of several major and intermediate size mines. Mining and exploration has occurred in the past with no adverse effects on wildlife. The dangers to fish and wildlife are not due to exploration or mining.

The real dangers to fish and wildlife in the Tangle Lakes area are due to ineffective regulation and control of fishing and hunting activity and to ineffective predator control. Management, not creation of new refuges is what is needed. This management will be required no matter what other activities are in the area. Examples abound of wildlife moving into areas with people because of predation by wolves and bears. This was the case at Valdez Creek Mine where each year moose calved right adjacent to large bulldozers working on reclamation. Mining and exploration were not the problem then and they will not be the problem in the future.

State planning efforts for the region occurred in 1985 and 1991. Local Area Plans include mining as an expected use. Companies have relied on these plans when deciding where to invest their scarce exploration dollars. Also, mineral development is important to help the State diversify its economy. Most areas of the State do not have oil, gas or timber resources that can be developed and tourism is feasible only for limited periods of time each year.

Alaska has millions of acres that are already in federally designated parks, preserves, refuges, monuments, wildernesses, etc. where nearly all human activity, other than hiking, fishing and some restricted hunting, is prohibited. The amount of federal land in Alaska that is legislatively closed to mining is huge - it is equal to the combined total acreage of the states of New York, New Jersey, West Virginia, Ohio, Indiana, and Illinois. Additionally, the State has several million acres already designated as parks and refuges. **No more refuges or other set-asides are needed or justified!**

Many of the lands within the various set-asides are highly prospective for mineral development but these are totally off-limits to development. Those lands that remain available for mineral development must stay that way and not be encumbered with refuges or any other restrictive land use designation.

We urge you to reject Proposal 86.

Sincerely,

Steven C. Borell, P.E.
Executive Director

Cc: Commissioner Denby Lloyd
Commissioner Tom Irwin

COMMENT# 1

John Morack
1621 Wolverine Dr. Fairbanks, AK 99709

February 3, 2008
Attn: BOG Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Members of the Alaska Board of Game,

I have lived in Fairbanks and hunted moose in Unit 20 since 1968. In particular I have hunted in the Goldking Creek area for many years and would like to comment on several proposals coming up at the Spring 2008 meeting.

Proposals 89 and 90 I am most concerned about the proposals to eliminate the Wood River Controlled Use Area and/or modify the allowed use of ATV's in the area. It is **not true** that few animals are harvested in this area because of the difficult access. Most of the area is heavily hunted after the close of the regular season when the ground is frozen and the winter trails can be used. If the regulations for the area are eliminated or modified, hunters on ATVs will try to use the winter trails before the ground is frozen. This will create trail damage similar to that on the Rex Trail. The area south of the Japan Hills is particularly susceptible to this kind of trail damage and at some point all of these trails will become unusable, even during the winter! Leave the regulations in the Wood River Use Area unchanged. It appears a similar situation exists in the Delta Creek Control Use Area (Proposal 38) and I encourage you to look carefully at this for the same reasons.

Proposals 25, 26, 27, 28, 36, 130 The intensive management of the moose population in Unit 20 has led to many problems which need to be fixed. I am sympathetic to the problem of over browsing and am not against some sort of cow harvest. However, I believe the excessive cow hunts of the past few years have led to a severe over harvest in most of the accessible areas. The simplistic approach of reducing the population to 12,000 moose by whatever means does not necessarily solve the over population problem and has led to many conflicts! The Department admits that in many of the unaccessible areas, the populations are still on the increase! The proposal the Department has submitted (Proposal 130) appears to be just more of the same and this is not acceptable. I have a serious concern that the Department was unable to do an airborne population survey in October. I strongly feel this survey is necessary to justify a continued intensive harvest. Without

Tel 907 479-2676 *Email* jmorack@acsalaska.net

COMMENT# 2

knowing the distribution of the population in addition to the total number, the Department is not making decisions based on actual knowledge. Mathematical models (whose uncertainties are 20%) are simply not adequate to continue the intensive harvest. If the accessible areas have been over harvested (as it appears most of the hunters believe), then maybe it is time to step back for a year or so until new data is available. I do not believe that many of the moose in the over populated areas are going to find their way into the over hunted accessible areas any time soon. I base this on Department data that indicates a very limited redistribution of moose into recently burned areas. The cow hunts in 20A should be stopped or severely reduced until further data is available and care should be used in order that a similar situation doesn't occur in 20B.

Proposals 108 and 110 At this point it makes no sense to increase predator control in Unit 20. Predators are the only way to keep the moose population under control in areas of limited access and are therefore needed. They are probably also responsible for some redistribution of moose into over hunted areas. It may be necessary to limit the taking of predators in the future just to prevent a crash in moose population. I recommend rejecting these proposals.

Proposal 109 It isn't clear to me how the numbers for the moose population objectives in 20A were determined to begin with. Numbers in the past have been at a much higher level. I agree that this is a good time to revisit these objectives and possibly increase the numbers.

Additionally I disagree with moose hunting season in 20A being left open for a continuous six month period, especially in the winter when the moose are under stress. I believe the cow season should not be open after the bulls drop their horns in December (allowing them to be taken) when there are horn restrictions in place during the regular season.

In summary, the cow moose season in 20A should be stopped or severely reduced until better data becomes available. Changes should be made in future moose hunts in 20A to limit over hunting and trail damage in accessible areas. No changes should be made to the Wood River Controlled Use Area since there is currently an adequate harvest of moose and likely trail damage will occur if ATV use is expanded.

Thank you for listening to my comments.

Sincerely yours,

John Morack

COMMENT# 2

John Giuchici
118 Dunbar Avenue
Fairbanks, AK 99701
(907) 455-6533

February 8, 2008

Attn: BOG Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Proposal 109 – 5AAC 92.108

This proposal will fix many problems that now exist with the 10,000 – 12,000 population objective for the following reasons:

1. There would not be a need for prolonged seasons that stress the population during the late winter months.
2. There would not be the current number of conflicts between trappers and hunters.
3. During the antlerless hunts a provision "No person may take a calf or cow accompanied by a calf," could be included and not affect the antlerless harvest objective.
4. The incidental take of anterless bulls could be eliminated.

Proposal 130 – 5AAC 85.045 (a)(18)
Proposal 131 – 5AAC 85.045 (a)(18)

The antlerless hunts should not be reauthorized in Unit 20A and 20B unless the following provisions are included:

1. One Antlerless Moose: However no person may take a calf or cow accompanied by a calf.
2. No antlerless hunts after November 30
3. No proxy hunting permits for registration hunts.

COMMENT# 3

RECEIVED TIME FEB. 8. 5:13PM

John Giuchici
118 Dunbar Avenue
Fairbanks, AK 99701
(907) 455-6533

Proposal 89 – 5AAC 92.540 (3)(F)(ii)
Proposal 90 – 5AAC 92.540 (3)(F)

This area is closed to motorized vehicles from August 1 – September 30. It should not be changed. With all of the problems on the Rex Trail, there is no reason to expand the problems to the Wood River Controlled Use Area.

John Giuchici
118 Dunbar Avenue
Fairbanks, AK 99701

COMMENT# 3

RECEIVED TIME FEB. 8. 5:13PM

February 5, 2008

PO Box 60354
Fairbanks, Ak., 99706

Alaska Board of Game
Attn; BOG COMMENTS
Alaska Dept. of Fish & Game
Boards Support Section

RE: Oppose Proposals 89 and 90, to eliminate the Wood River Controlled Use Area

Dear Sirs:

I am opposed to the elimination of the Wood River Controlled Use Area. I have hunted in the Gold King area since 1983 and have been a full time resident of Gold King since 1999. In that time I have seen the moose hunting in this area degraded due to the large number of hunters along the Rex Trail and Gold King airstrip. Large trucks and track vehicles using the Rex Trail have turned it into a 50 mile long mud hole. I used to be able to go all up and down the Rex Trail in a 3-wheeler, but now there are a lot of places I won't go in a 4-wheeler. This past September a portion of one neighbor's access trail to the Rex Trail was used by some large trucks, which left it rutted, muddy and useless.

My only alternative is to hunt the Wood River Controlled Use side of the Rex Trail, as it is closed to motorized vehicles. I have to pack a moose to the trail, but the peace and quiet of the hunt is worth it.

If the Wood River Controlled Use Area is opened up to motorized vehicles, soon all the winter trails will be rutted and full of large mud holes. A large portion of the few trails in the controlled use area are over wet, swampy areas, that cannot take much summer time use. This will make the trails nearly useless until a lot of snow covers the ruts. Once a trail is torn up and rutted, it is never the same, and will never be repaired. Just look at the Rex Trail today. The time of unrestricted summer time use of trails by large vehicles is over.

I urge you to reject Proposals 89 and 90.

Thank you for considering my comments,

Sincerely,

David F. Pott

COMMENT# 4

January 10, 2008

RECEIVED
FEB 0 4 2008
BOARDS

ATTN.: BOG Comments
Alaska Dept. of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811

Dear Board of Game:

The purpose of this letter is to express my support of proposals 59 and 60, due to be considered at your January meeting.

I live very close to Chugach State Park and hike, ski and walk my dog there on virtually a daily basis. I am aware that the trapping area is not immediately adjacent to the trails on the Hillside, but I am concerned for the safety of dogs traveling with backcountry skiers. I also appreciate the opportunity to view wildlife while in the Park and this includes wolverines; one of which I saw on the Powerline Pass some years ago.

I support proposal 59 which limits the types and sizes of traps which can be used in Chugach State Park, first, as a safety measure for dogs and humans and, secondly, as a means of restricting the size of animals which can be trapped. I do not understand how the Board of Game could authorize the trapping of wolverines in the face of the biologists' opinions that the small number of wolverines in the Park could not sustain trapping. This threat is further compounded by the fact that the regulations only require a trapper to have a pelt sealed within 30 days of the conclusion of the trapping season. Consequently, there is no way an emergency closure could be invoked to attempt to save a sustainable number of animals.

I also support proposal 60 with its 5 mile buffer for the same safety reasons as stated above. It would also serve to discourage persons who are inexperienced or novice trappers, but who decide to attempt trapping in Chugach State Park because of all the recent publicity. Who knows where they will set traps or what kind of traps they will set?

As the Board is aware, one of the statutory purposes of the Park is to provide opportunities for wildlife viewing. The Board is also aware that the Park is extensively used by recreationists. For these two reasons, the Board should adopt the most conservative trapping means and methods, to protect the wildlife and the Park's users.

Thank you for this opportunity to comment.

Sincerely yours,

Susan Olsen
8601 Sultana Drive
Anchorage, AK 99516

COMMENT# 5

RECEIVED
FEB 0 6 2008
BOARDS

PROPOSAL 19: OPPOSE

BY MODIFYING THE SEASON TO A LATER DATE, YOU WILL BE GETTING INTO THE RUT SEASONS.

Allen G. Avenger

PROPOSAL: 25 SUPPORT

NEED TO STOP THE ANTLERLESS MOOSE HUNT FOR A FEW YEARS TO SEE WHAT EFFECT IT IS HAVING ON THE MOOSE POPULATION. WHAT'S THE RUSH.

Allen G. Avenger

PROPOSAL: 26 SUPPORT

WHY NOT TAKE THE BULLS WITH 36 INCH OR 3 BROW TINES, TROPHY HUNTERS AND GUIDES WILL OBJECT, MEAT HUNTERS WILL BE HAPPY

Allen G. Avenger

PROPOSAL: 27 SUPPORT

SAME AS IN PROPOSAL NO. 25

Allen G. Avenger

PROPOSAL: 28 SUPPORT

REASON, SAME AS IN PROPOSAL NO. 25

Allen G. Avenger

PROPOSAL: 33 OPPOSE

GAME IN ALASKA IS THERE FOR ALL RESIDENTS, ANY RESIDENT SHOULD BE ABLE TO HUNT ANYWHERE THEY HAVE A PERMIT OR IF A PERMIT IS NOT REQUIRED THEY SHOULD BE ABLE TO HUNT.

Allen G. Avenger

PROPOSAL: 35 SUPPORT

WOULD GIVE MORE PEOPLE A CHANCE TO GET A MOOSE

Allen G. Avenger

PROPOSAL: 36 SUPPORT

WHERE ARE THE MOOSE, 5 TO 7 YEARS AGO, WE SAW MOOSE EVERYWHERE, BROWSE IS OVER GROWN

COMMENT# 6

Allen G. Avenger
PO Box 354
DELTA Jct, AK 99737

PROPOSAL: 38 SUPPORT

ANYTHING TO KEEP ATVs FROM TEARING UP TRAILS

Allen H Avenger

PROPOSAL: 43 SUPPORT

NEW TECHNOLOGY IS NICE, BUT MOST AMERICANS END UP MISUSING IT, AS WITH ATVs THEY ARE NICE BUT MOST HUNTERS MISUSE THEM, SUCH AS CHASING GAME

Allen H Avenger

PROPOSAL: 44 SUPPORT

SAME REASON AS STATED IN PROPOSAL NO. 38 AND 43.

Allen H Avenger

PROPOSAL: 130 OPPOSE

ALREADY KILLED OVER 2000 COW MOOSE, SOME THEM BEING PREGNANT. NEED TO STOP A FEW YEARS AND SEE WHAT THE EFFECT IS BEFORE IT IS TO LATE

Allen H Avenger

PROPOSAL: 131 OPPOSE

DON'T KNOW HOW MANY HAS BEEN KILLED, MOOSE MOVE FROM ONE AREA TO ANOTHER, STOP THESE ~~ANTLER~~ ANTLERLESS FOR A FEW YEARS, NEED TO FIND OUT THE EFFECT THIS IS HAVING ON MOOSE POPULATION

Allen H. Avenger

PROPOSAL: 135 OPPOSE

AGAIN WHERE ARE THE MOOSE, THE BROWSE IS OVER GROWN, WE SEE NO MOOSE. I SHOULD BE SUPPORTING THIS AS WE HAVE A ~~LARGE~~ LARGE GARDEN, IN THE LAST 5 TO 6 YEARS NO MOOSE PROBLEMS

Allen H Avenger
PO Box 354
DELTA JCT, AK
99737

COMMENT# 6

February 5, 2008

Alaska Dept. of Fish and Game
ATTN: BOG Comments
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

To The Board of Game Directors:

Enclosed are our comments on the Interior Region proposals. Please take our comments into consideration during deliberations on the proposals.

If there are any questions, please contact, Ms. Stickwan at (907) 822-3476.

Sincerely,
Gloria Stickwan
for
Linda Tyone
Linda Tyone, Chair

Enc. 1

COMMENT# 7

Alaska Board of Game Interior Region Proposals
Pike's Waterfront Lodge, Fairbanks, Alaska
February 29-March 10, 2008 8:30 a.m.

Proposal 1:
No comment on Proposal 1.

Proposal 2:
We oppose Proposal 2 because of enforcement issues.

Proposal 17:
We support Proposal 17 to have a "three month trapping lynx season in Unit 20 from December 1-February 29 with a bag limit of 5 lynx during November to allow for incidental harvest". It would make the whole unit uniform.

Proposal 19:
We oppose Proposal 19, because it is too vague, no season dates for Unit 20 Moose is given by the proponent.

Proposal 21:
We support Proposal 21 with an amendment of non-resident hunt from August 20 to September 20 to give residents first opportunity to hunt.

Proposal 22:
We support Proposal 22 in Unit 12 – that portion west of the Glenn Highway and south of the Alaska Highway, excluding the Tok River drainage, with a take of 100 Bull Macomb Caribou with season dates of Aug. 10-Sept. 30.

Proposal 23:
We oppose Proposal 23 to change regulation to 50 inches or greater take of Unit 20 Moose or 3 brow tines on one side of antlers to prohibit taking of spike fork moose or cows.

RECEIVED TIME FEB. 5. 3:39PM

COMMENT# 7

Proposal 24:
We support Proposal 24 as written.

Proposal 25:
We support Proposal 25 with an amendment to close hunting antlerless moose on the road accessible portions of Unit 20A. We believe it is adversely affecting the moose population in Unit 13E.

Proposal 26:
We do not support Proposal 26, to define a legal bull in the general hunt as Unit 20A spike-fork, 36-inch or greater antler spread, three brow tines.

Proposal 27:
Our comments are the same as in Proposal 25, keep Antlerless Unit 20A Moose season on the road accessible portions of Unit 20A.

Proposal 28:
Our comments are the same as in Proposal 25, keep Antlerless Unit 20A Moose season on the road accessible portions of Unit 20A.

Proposal 34:
We oppose Proposal 34 to allow a longer Unit 20C Moose season from Sept. 5-30 in the Kantishna River area.

Proposal 36:
Our comments are the same as Proposal 25.

Proposal 43:
We oppose Proposal 43 it is impossible to enforce.

Proposal 44:
Our comments are the same as in Proposal 43.

Proposal 76:
We oppose Proposal 76 to separate the Unit 12, Unit 13C and Unit 20D Sheep hunt to nonresidents and residents.

COMMENT# 7

RECEIVED TIME FEB. 5. 3:39PM

Proposal 77:
We oppose Proposal 77 to allow "20% of the nonresident tags to be awarded to 2nd degree of kindred hunters".

Proposal 82:
We support Proposal 82 to "liberalize and simplify beaver seasons, bag limits and harvest methods - utilizing a rifle, only for Unit 12, Unit 20A, Unit 20C from Sept 15-June 10 with no limit, and Unit 20D from Sept. 25-May 31 with no limit.

Proposal 83:
We oppose Proposal 83 "to allow the use of scent lures while in the act of floating rivers, creeks, or lakes in either boats or rafts in Unit 12 or Unit 20". This would be dangerous to have scented lures while floating creeks or lakes.

Proposal 84:
We oppose Proposal 84 to establish a preference system for drawing permits as stated in the proposal; if a person does not apply for whatever reasons, he/she will lose points. This was addressed at the Statewide BOG meeting.

Proposal 85:
We support Proposal 85 to allow a Unit 12 and Unit 20 Dall sheep hunting season for residents from August 8 – September 25, so that residents will have more opportunity to hunt for Dall sheep.

Proposal 86:
We support Proposal 86 to request the Board of Game to "recommend, per its authority under Alaska Satatue 16.05.255(a) (1) to the legislature for approval the establishment of a wildlife refuge as follows:

The Unit 13 state-land and waters with these boundaries:

- **On the west by the Maclaren River**
- **On the east by the Richardson Highway**
- **On the south by the Denali Highway**
- **On the north from the northeast corner of Sec 11, T20S, R6E, eastward to the northeast corner of Sec. 7,T20S,R10E, then south to the northeast corner of Sec. 30, T20S, 10E, then east to the Richardson highway**

COMMENT# 7

RECEIVED TIME FEB. 5. 3:39PM

This is an important migration Nelchina Caribou Herd and moose habitat, and any mining done within this area will greatly and adversely affect the caribou herd and moose. It also is an area where important artifacts have been found, and it is imperative that this area is protected from mining. Additionally, it is an important berry picking, and fresh water lake fishing place for the Ahtna People. We hunt, fish and pick blue berries along the Denali Highway, and would like to see this area free from mining.

Proposal 89:
We oppose Proposal 89.

Proposal 90:
We oppose Proposal 90 to "delete the Wood River Controlled Use Area"; so that the west bank of the Wood River will be accessible and not within a "Controlled Use Area".

Proposal 91:
We support Proposal 91 to close the area in the Unit 20 Kantishna River Area to air boat use and traffic. Air boats are noisy and disturb wildlife and hunters.

Proposal 92:
We support Proposal 92 to close the area in the Unit 20 Nenana Controlled Use Area to air boat use and traffic. Air boats are noisy and disturb wildlife and hunters.

Proposal 130:
See our comments on Proposal 25.

Proposal 135:
We oppose Proposal 135 to "reauthorizing the antlerless moose hunting season in Unit 20D, or to create an antlerless registration in the same area", rather ADF&G and DNR should do a control burn within this area.

COMMENT# 7

RECEIVED TIME FEB. 5. 3:39PM

Proposal 136:
We support Proposal 136 to "reauthorize the brown bear tag fee exemptions in Region II, so that more brown bear may be taken, and hunters will not have to buy a tag.

Proposal 137:
We support Proposal 137 to "reauthorize the brown bear tag fee exemptions in Unit 20D, so that more brown bear may be taken, and hunters will not have to buy a tag.

RECEIVED TIME FEB. 5. 3:39PM

COMMENT# 7

RECEIVED
JAN 2 8 2008
BOARDS

Request the following Comments on the Proposals be considered for the Spring 2008 Board of Game Meeting:

PROPOSAL 84: Support as amended...The Drawing Permit Hunt System needs a preference point feature that helps ensure it is fair to all applicants. Although I have drawn some permits over past 30 years...many other applicants have drawn NONE, while yet others have drawn lots. Some applicants get several Bison or Tok Sheep permits...while thousands of other applicants never ever, get any Permits! The current system is clearly unfair. With today's computers, it should not be very costly or complicated to track preference points. Several States already do this. I'd recommend all Permit Hunts be incorporated into a Preference Point System. Applicants earn one Preference Point for each year the specific hunt is applied for. Individuals with most points have priority in drawing.

PROPOSAL #85: Support...Allow Sheep Season to open two days earlier for Residents. Guided Hunting pressure has steadily increased since the courts eliminated "exclusive guide areas" in the 1980's, leaving residents with fewer and fewer options. These extra days will help disperse hunting pressure, provide for higher quality hunts for all. In many cases, residents would complete their hunt in these two days...leaving the area more open for guide's and clients.

PROPOSAL #86: OPPOSITION...Please DO NOT lock-up any more of Alaska. The last thing we need is another Park, Blocked Trail, or Refuge. We have any ready lost too much of our State with ANILCA, Private Land Ownership, BLM and Park Service blocking trail access, etc.

PROPOSAL #89: OPPOSITION...The Wood River Controlled Use Area needs to remain CLOSED 1 August to 30 September. Opening this area to motorized vehicles in September would only add more permanent scars to the Tundra Hill sides, like the Rex Trail has become with increased use! It is true that harvest levels for Moose have not been met, but for the most part, Moose have been exterminated within 5 miles of the Rex Trail. Adding ATV's in September will not significantly improve the harvest because they do not have the range snowmobiles are ready have later in the year. This recommendation comes from an avid ATV'er and who normally supports more ATV use throughout the State. After hunting this Controlled Use area numerous times on foot in August/September...it obvious this area would be totally wrecked with pre-snowfall vehicle use.

Thanks,
Dave Machacek
840 Pickering Drive
Fairbanks, Alaska 99709

COMMENT# 8

RECEIVED TIME JAN. 28. 3:47PM

February 5, 2008

ATTN: BOG COMMENTS
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau AK 99811-5526

BY FAX

Re: Proposal #86 – SUPPORT

Dear Board of Game:

As a resident of Kenny Lake, I have a strong interest in the Tangle Lakes and surrounding area. My friends hunt there, and I benefit from their success. I camp, hike, backpack, berry pick, watch birds and other wildlife, enjoy wildflowers, and view the scenery there. The area is enjoyed by many other individuals for a wide variety of purposes, and local businesses operate there successfully.

A large-scale mine in the area would first and foremost be detrimental to the health of the enormously important Nelchina Caribou Herd. For locals and others from throughout the region the herd is a very significant subsistence resource. Non-hunters enjoy one of the few road accessible caribou herds in Alaska as well.

Such a mine would also affect virtually every other user with its extensive mined area, roads, heavy truck traffic, transmission lines, etc. It would be a large scar that would destroy the natural and wild feel of this popular, accessible area. The experience of both Alaskans and our visitors would be severely compromised. This is no place for a large mining operation.

The Department of Natural Resources is the present manager of these lands. DNR's primary mission is to accommodate resource extraction, not protect fish and wildlife and the use and enjoyment of these resources. The Department of Fish and Game needs to be given a significant role in the area's management, and a Tangle Lakes State Wildlife Refuge is the best vehicle to accomplish that goal. Existing mining claims would remain valid, but new ones would not be allowed. If mining were to go forward on those existing claims, ADF&G would do a **far** better job of minimizing the effects of mining on important fish and wildlife resources.

Yet it's not even clear in any case that commercially viable mining deposits exist in the area. Anglo American, a major international mining company, after several years of work and the expenditure of several million dollars, concluded that it was not worth its while to explore further. That a junior mining company continues to try to attract investment to the area is less telling than that an experienced, major mining company has withdrawn.

I urge you to provide this popular and wildlife rich area with the protection it deserves by designating the Tangle Lakes State Wildlife Refuge.

Sincerely,

Cliff Eames

Cliff Eames
Kenny Lake, Alaska

HC 60 Box 306T
Copper Center, AK 99573

COMMENT# 9

Board of Game Comments
ADF&G
PO Box 115526
Juneau, Alaska 99811-5526

INTERIOR REGION PROPOSAL 85 - 5AAC 85.055 "SUPPORT"

****

INTERIOR REGION PROPOSAL 85 - 5ACC 85.055 "SUPPORT AS AMENDED"

Residents: August 5th or7th - September 20th or 25th or better yet the 30th.
Nonresidents: August 10-September 20

Issue: I would like sheep season to start three to five days earlier for resident hunters and remain open as long as (Sept.20th), or five days longer (Sept.25th), or up to ten days longer (Sept30th).

What will happen if nothing is done?: As told to me, by one of our guides, "we are professionals", I took that to mean, that they are very efficient at their trade, in addition to receiving monetary compensation. That compensation bolsters an elaborate development of field advantages, i.e., a resource filled lodge to base from, aircraft, landing strips, camps, "spoof camps", boats, atv's, horse's, guides, assistant guides, cooks and wranglers, all of which contribute to a much higher rate of success for their clients. Our guide industry is efficiently taking more and more of our Alaskan resource, with their only limiting factor being, how many hunters they can book at sheep convention. Thus the Alaskan resident is more and more disenfranchised, being continually out resourced by our guide industry. The guides and their crews are in the field weeks before the regular season , year after year, to set up not only numerous camps, but numerous "spoof camps", effectively blockading many resident hunters, from countless drainages, and ridge systems. Assuring the guides, mostly non-resident clients, a distinct advantage to our State game resources. This advantage, in what the guide considers "his area", combined with fellow guides, creates an advantage that is felt State wide.

Who is likely to benefit?: All Alaska resident, (Interior Region III) sheep hunters.

Who is likely to suffer?: No one, because nothing is taken away. The guide industry is not restricted by this proposal.

Other solutions considered?: Yes, and I support those solutions, that have the PRIORITY to share fairly, our Alaska Fish and Game resources. Starting FIRST with ALL our state residents, SECOND with SOME of our nations citizens, and THIRD with a FEW of our nations allies.

Vern Fiehler
POBox 210283
Auke Bay, Alaska. 99821
789-1085 or 789-2100

COMMENT# 10

Comment in support of proposal #35, as it is written page1

RECEIVED
FEB 01 2008
BOARDS

Dear members of the Board of Game,

As the original author of this proposal, I have a vested interest in it's integrity. Not because it is my idea, but because I believe it will benefit hunters and their families, and create an opportunity for those who still haven't harvested a moose late in the season. It was heavily supported as written (I believe the vote was unanimous) by the Delta advisory committee.

As I stated in the proposal, it is very important that the south bank of the Tanana river be the boundary, so that the islands along the river might be included. As you know, the Tanana river is very braided in this area, with many branches and sloughs, and these create a lot of islands in the river. These islands are great for moose but are either heavily wooded or are covered with brush. About the only way to harvest a bull moose in this area is to "call one in."

As you are well aware, it is easier to call in a bull from the 15th to the 20th of September, because they are coming into the rut. This creates a small window of opportunity for hunters. It is imperative that the boundary for this extended season be the south side of the Tanana river, so that the islands in the river might be included.
The Johnson island, for example, is five miles long and a mile wide and has some old logging sales on it. It would be a great place to hunt moose, especially late in the season.

I understand that the department (ADF&G) intends to support the proposal, but with an amendment. Because of a technicality, they contend that the border of the later season area should be the North bank of the Tanana river, which would eliminate the islands from late season hunting. This isn't what I had in mind at all, and would effectively sabotage a good hunting opportunity.

The technicality in question is the border of the Delta Junction non-subsistance area, which I am told is the Northern bank of

COMMENT# 11

the Tanana river. As there are no special subsistence hunts in this area, I think the location of this boundary is irrelevant.

I would respectfully ask the Board to keep these things in mind as you consider this proposal. Thank you.

Tommy Geyer

Please feel free to contact me if you need to.

Tommy Geyer
Home (907) 323-3030
Work (907) 323-4127
Email- tcgeyer@gmail.com

COMMENT# 11

Comments on proposal # 2 – Support proposal with modifications

I have hunted in unit 12 in the past, and would like to make the following suggestions:

I have never liked the split season for moose, especially elimination of Sept. 1-7 for hunting. Currently the dates for moose are August 24-28 for spike/fork, and Sept. 8-17. Sept. 1-7 is one of the best times to hunt moose. I have always hunted during this period, and have enjoyed beautiful autumn colors, warm days and cool nights.

I think moose hunting in august, if the weather is too warm, can contribute to meat spoilage, especially on an extended, multiple day hunt. And, if you are hunting too late, especially up in the mountains, bad weather can surely have an impact on your hunting, and getting your meat out in a timely manner.

Also, hunting during the rut, as late as Sept. 30, as has been suggested, would certainly increase your chances of getting a nasty tasting moose.

What I would suggest as a compromise, if it is agreeable to Mr. Browning would be the following season.

Sept. 1-20 Residents- one bull Nonresidents-5o inch or 4 brow tines

If the moose numbers in unit 12 could not withstand an any bull season, then the following season would be my preference.

Sept. 1-20 Residents- spike fork, 50 inch or 4 brow tines

Nonresidents- 50 inch or 4 brow tines

Thanks, Tommy Geyer

COMMENT# 11

COMMENTS ON PROPOSAL #38 – 0PPOSING

Dear members of the Board of Game,

I was initially in favor of this proposal, when it was first presented to the Delta Advisory Committee by Don Quarberg, and voted to adopt the proposal as our own (as from the committee.) There is concern on the committee about the degradation of habitat in the area, especially in the alpine areas surrounding Delta Junction.

Initially I had the impression that the area in question was a pristine jewel that no one hunted in, and should be preserved as such. Little did I realize that hunters had been using the area for years and years.

As with so many of our proposals, this one is not a win/win situation. Those who can fly in to the area would benefit by eliminating hunting pressure from those crossing the Delta River on ATVs. I see now that hunters who have been using the area would suffer. I realize now that this is a conflict between two user groups.

I voted initially to support the proposal, but now I realize that I made a mistake. Since that time I have resigned from the Delta Advisory Committee. I know that if someone inadvertently was eliminating me from using my hunting area, I would throw a fit.

Today, after making a phone call, I discovered that the community of Whitestone would also be affected by this proposal. About twenty or thirty from this community hunt moose in the area which would be restricted, and they use motorized vehicles to transport meat. I believe it would be better to leave things as they are, rather than to restrict the area to fly in only.

Thank you. Yours Truly, Tommy Geyer

COMMENT# 11

Native Village of Nunapitchuk
Nunapitchuk IRA Council
PO Box 130
Nunapitchuk, Alaska 99641
Phone: (907) 527-5705; Fax: (907) 527-5711
Email: nunap.admin@gmail.com

January 21, 2008

ATTN: BOG Comments
Alaska Department of Fish & Game
Boards Support Section
PO Box 115526
Juneau, Alaska 99811-5526
Fax: (907) 465-6094

Proposal 4 -5AAC 85.025. The Nunapitchuk IRA Council supports this proposal to do away with sports hunters but enabling subsistence hunters to harvest.

Proposal 5- 5ACC 85.025. The Nunapitchuk IRA Council supports this proposal in the hopes the caribou herd to rebound.

Proposal 7- 5ACC 99.025. The Nunapitchuk IRA Council supports this proposal for the Department to make informed decisions based upon accurate or better data.

Thank you for this opportunity to comment.

Sincerely,

Zechariah C. Chaliak Sr.
President

ZCC,Sr.; ejw
Cc: files

COMMENT# 12

January 22, 2008

Board of Game Comments, ADF&G
P.O. Box 115526
Juneau, AK 99811

Dear Board Members,

I would like to express my **Opposition** to **Proposal 85** which requests in part that resident hunters be allowed to begin hunting sheep 2 days earlier than non-residents.

The apparent intent of this proposal is to reduce or eliminate competition from licensed guides whose clientele is almost exclusively non-residents.

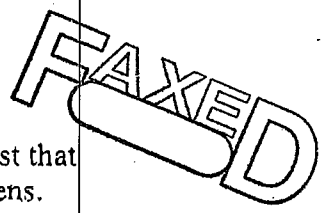
It goes without saying that it would create utter havoc in the guiding industry if residents were allowed to establish themselves at various access points and begin hunting areas prior to guide's arrival with their non-resident clientele. Especially considering that in many cases, these access points would not even exist were it not for the considerable effort and expense put forth by the very guides who would be displaced.

Like it or not, non-residents are one of Alaska's most important user groups in terms of funding for wildlife and other revenues to the state. Jeopardizing their hunting experience for the benefit of a few resident hunters who have difficulty competing for the resource on equal terms would not be a wise decision.

Sincerely,

David S Morris

Dave Morris



To Whom it May Concern:

Please consider this as a public comment against the killing of wolves. I request that F&G not change the current regs which are against killing wolf pups in their dens.

Sincerely,

Debbie McBride

Debbie McBride

Juneau, Alaska

Hunting and trapping regs before Game Board, including killing of wolf pups in dens

The state Board of Game begins a three day meeting in Anchorage today. (Friday)

The Board's Executive Director Kristy Tibbles says there are over 70 proposals submitted by members of the public, advisory committees, as well as the Department of Fish and Game..

The proposals concern statewide regulations for hunting and trapping.

One proposal is from the residents along the Kuskokwim River.

They want state game managers to allow them to kill wolf pups in their dens.

The tribal government and a Fish and Game advisory committee along the central Kuskokwim River have submitted separate proposals asking the Board of Game to overturn regulations outlawing the practice.

The tribal council and advisory panel also want the board to let hunters kill bear cubs in dens.

Doug Carney of Sleetmute, former chair of Central Kuskokwim Advisory Committee, says along with wolves, bears are blamed for low moose numbers around central Kuskokwim villages.

Other proposals include changes to the state's permitted hunts drawing system that deal with bonus points or preferences, bear baiting and interfering with guided hunts.

Other proposals include bear baiting and interfering with guided hunts.

Tibbles says the public is encouraged to testify in person. The cut-off time to sign up is Saturday morning at 9-30.

Testimony will not be taken by telephone at this meeting.

The fax number for written comments is 465-6094.

COMMENT# 14

Proposal 91

RECEIVED
FEB 0 6 2008
BOARDS

Support

Mike Turner
10/27/07

Board OF Game

I Am A Nineteen year resident OF OF the Kantishna river, Near the Bear Paw river. My Family And my self have And do live A subsistance Life style out here.

The Kantishna river has in the past been closed to Airboat Traffic And up untill last year "2006" All the residents And myself OF the Kantishna River Aren, thought it was still Closed. That is, untill A big camp OF Airboats with several Moose hangins was observed on the Lower Kantishna, And up the Toklat river, ADF+G Test wheel operators observed Airboat operators running over the Salmon spawning grounds And the wet Lands OFF The river itself.

For confermation OF this contract, Pete Cleary 459-7254 biologist ADF+G FBKs.

All the land Adjacent to the Kantishna And Toklat rivers is consisted OF A Large portion OF Floating muskeg And wet meadows. Any Airboat can get OFF the river And run For miles back through this country And the moose Are At thier mercy. This is Not what I call Fair Chase. The country itself should be protected From Airboats And possible misuse they can And do present.

Thank you

Mike Turner

COMMENT# 15

RECEIVED

JAN 2 2 2008

BOARDS

Rationale for the Alaska FNAWS Proposal #74 (Board of Game number) to eliminate the plugging program for some Dall rams in Alaska

First, the plugging requirement is inconsistent and confusing across Alaska. Plugging of all sheep (or even all rams) harvested is not required. Plugging is only required where there are horn size restrictions, basically for full-curl rams. This means plugging doesn't include all the sheep or even all the rams harvested in Alaska. In the "Anchorage Region" (which we call "Region II" for Wildlife Conservation Division purposes), plugging is required only for rams harvested from the Kenai Mountains (which produce a small harvest), the Talkeetna Mountains (again, a relatively small harvest), and the Tonsina Management Area (a walk-in only area where harvest is small). With the newly passed "any ram" hunt in the Chugach, the only required plugging of rams from the Chugach Mountains might be for rams taken in portions of GMU 14C where (and when) the harvest limit happens to be a full-curl ram, and rams taken from GMU 14A and 13D when and where full curl bag limits are in effect. Seasons, bag limits, and methods and means in GMU 14C are also variable by area and season dates. Hence, when/where plugging is required is quite confusing, and probably does not foster a respect for (let alone an understanding) of the regulation. Also in Region II, it is possible that sheep from the southwest corner of the Wrangell Mountains (in GMU 11 where state regulations prescribe a 3/4 curl ram minimum for Alaska residents and a full-curl minimum for nonresidents, it seems that hunters harvesting either size ram (we'll not even consider federally recognized subsistence hunteres here) are required to have to have their horns plugged. If hunters are required to have rams "down to" 3/4 curl plugged from this area, and if hunters harvesting full-curl rams (either from this area or from other full-curl areas) must have their horns plugged, what does a "plug" show about the legality of a ram from anywhere in Alaska? It seems to "prove" very little about the legality of any given sheep. Alaska FNAWS thinks the program must either be standardized or deleted. It fulfills neither of the purposes for which it was promulgated. It does not limit illegal traffic in Dall sheep horns, it does not curtail the harvest of legal rams, and it provides no information on biological data relevant to management of sheep. Additionally, it is unnecessarily confusing, and confusion tends to erode the potential for effective management.

Second, for a regulation to be "embraced" as a matter of conservation and become colloquially codified as one of the "mores" of sheep hunting which assures enthusiastic, voluntary compliance, it must serve some well-defined conservation purpose. The plugging regulation does not. As you know, the original purpose of the plugging was to prevent illegal traffic in bighorn horns. We know of no illegal traffic in Dall sheep horns, which are common in Alaska. Additionally, if there were illegal traffic, it would be most likely from subsistence areas because, in Alaska Native communities where sheep were historically part of the seasonal subsistence round, histories of trading in sheep meat and horn products have been well-documented. Sheep from these areas are not considered "trophies," hence they may be traded; and they are exempt from plugging. Other Alaska sheep hunters are not heirs to this tradition of trading in sheep parts. They tend to prize and keep sheep meat and horns rather than bartering meat, hides, and artifacts created from horns which have been worked into traditional household implements.

Third, the present plugging program does nothing to assess harvest or gather biological data. Hence it serves no management or research purpose. With respect to harvest assessment, the plugging requirement is internally designed to be incomplete because it excludes sheep from areas with no horn size requirement. All hunters hunting within the "non-subsistence" system are already required to report on their harvests through the harvest ticket program. On this report, hunters must give horn length, base circumfrence, and age (as well how long they hunted, where they hunted, how they got there, and their residence status). Plugging is just a matter of having an ADF&G employee (most often a technician who is neither a biologist or manager) look at the horn, declare it "legal" (the incidence of "catching" sublegal rams in this program was less than 1% of those inspected according to data reported from the program to date), drill a hole in the horns and affix a plug (too-frequently through the sheath into the core--which complicates taxidermy considerably) and sending the hunter out the door. The program isn't much like plugging in other jurisdictions where photos and extensive measurements are taken and kept on file as permanent records.

Fourth, because plugging is only required where there are horn size restrictions. It completely neglects the most biologically significant sheep harvests in Alaska, subsistence sheep harvests. Where

there are lengthy (seven months is typical) "any sheep" seasons with liberal bag limits (three sheep is typical for subsistence areas on federal public lands) no harvest reporting is really required. "Paper" reporting requirements exist, but they have been traditionally ignored; and there is no significant harvest assessment effort (unless it is new). Alaska FNAWS would prefer that ADF&G biologists and wildlife enforcement officers put effort into assessing this more biologically significant harvest of ewes etc. than be occupied with a redundant partial certification of the full curl ram harvest.

Fifth, supporters of the plugging program (based on interviews with some ADF&G staffers, leaders from the Alaska Outdoor Council, and Alaska Professional Hunters Association) intuitively feel that "forcing the Department" to actually touch sheep horns and interact with those successful hunters who must present horns for plugging somehow provides an undefined management benefit to sheep. This seems unlikely, as the ADF&G employees who typically do the plugging work are technicians or seasonal employees who have little influence in the management process. The program in one form or another has now been in effect for four years. To date, has produced no benefit for sheep. Alaska FNAWS doubts it ever will, or would support its retention. Defenderts of the program assert it is good because it "gets hunters and managers together (just discussed)," and it "makes a hunter think twice before pulling the trigger." Neither of these post hoc rationalizations really makes any sense. One biologist in Region II, where sheep management is highly variable and based more on "instinct" than in any other area of Alaska, claims a benefit because of a paper which came out of the Yukon Territory seven years ago. In this study, an analysis of 30 years of annular segment length and curcumfrence data gathered through the plugging of about 2,500 sheep over the 30-year period indicated a statistical association of horn growth with an apparent decade-long climate cycle. This finding is interesting, but has yet to affect management at any level. There have also been allegations that the "drillings" could be sources of DNA for genetic studies or forensic use. This sounds good in the abstract, but careful evaluation of where DNA science really is today shows this is nothing but a "pipe dream" now, and will probably remain so for years to come. Even if forensic advantages in prosecution were to accrue from the "drillings," what would they accomplish, and at what cost? After having sp;oken with a recognized expert in the field of molecular forensics, I can see nothing of management significance from the DNA claim. If there were a common need to match horns to meat, DNA from the drillings would do it. At present there is no need for this level of technical forensic work. If there were, it is likely both horns and meat would be available anyway. The drillings are not needed for any practical use.

In summary, the plugging program was originally designed to eliminate illegal traffic in poached bighorn heads. To achieve this goal, each head must be rendered absolutely identifiable. Consequently, each segment length and annular circumfrence was recorded and kept as a permanent record. Also, photographic records of each head were made, permanently recorded, and linked to the hunter via the plug number. There is no way of knowing whether the collective efforts have actually reduced trafficking in poached bighorns. Much data has been amassed, but never analyzed and never applied to a mangement program. In Alaska, well-intentioned hunters proposed a plugging program for many years because "everyone else was doing it." A former Alaska FNAWS Board eventually sold the program to the Board of Game as a means of stopping the alleged harvest of sub-legal rams. The program has had no discernible or even inferential impact on horn size or a significant effect on the number of successful prosecutions for harvesting sub-legal rams. It has certainly had no beneficial effect on sheep hunting or management. Consequently, it is time to either fix or eliminate this diversionary and wasteful program and get serious about Dall sheep management. Alaska FNAWS sees no practical hope for "fixing" the program, and suggest the rational course is to delete it before it distracts us from actual sheep management any longer.

W. Heimer, Pres. Alaska FNAWS

Kgordon for
Wayne Heimer

COMMENT# 16

P.O. Box 145
Ester, AK. 99725
5 February 2008

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

RE: Proposal 130 – reauthorization of antlerless moose hunts

Position: **OPPOSED**

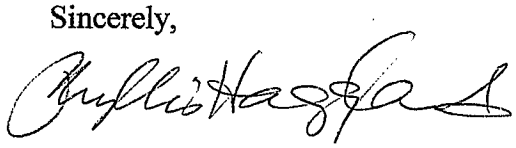
Reasons: 1. There are virtually no moose in our area this winter. We have lived in this location for 37 years and normally we see many moose throughout our acreage and throughout the Rosie Creek trail system.

2. My husband, who was born and raised in Fairbanks, is still a local commercial pilot. In the past he has flown with Fish and Game for wildlife surveys so he is very adept at spotting game from the air. He reports that there are very few moose between here and Clear.

3. I am philosophically opposed to killing breeding stock. I find the experts "science" short sighted and lacking common sense.

If you have questions please feel free to contact me. Thank you for your consideration.

Sincerely,



Phyllis Haggland
phaggland@yahoo.com
907-479-6737

COMMENT# 17

United States Department of the Interior
NATIONAL PARK SERVICE
Wrangell-St. Elias National Park/Preserve
P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

N1615 (WRST-AD)

February 12, 2008

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Attn: BOG comments

To Whom It May Concern:

I would like to take this opportunity to comment on Proposal 1, which requests a reinstatement of a registration hunt in Unit 12 for caribou. This hunt targets the Chisana caribou herd, which occupies Wrangell-St. Elias National Preserve (and limited National Park) lands almost exclusively within Alaska. In response to significant declines since the late 1980's, this herd has been the focus of a considerable Canadian/U.S. conservation effort since 2002 when a captive rearing program was begun on Yukon Territory lands immediately adjacent to Wrangell-St. Elias National Park and Preserve.

Although improved census efforts have shown the herd to be larger than expected when the captive rearing project began, the herd still maintains the Yukon Territory's highest protection status ("Species at Risk", where all harvest is prohibited), and is listed as a "Species of Special Concern" through the Canadian "Committee of the Status of Endangered Wildlife in Canada", which is the equivalent of the U.S. Endangered Species Act.

The stakeholders of the Chisana caribou herd include both Native and non-native users from the U.S. and Canada, and the management of the herd has involved numerous groups and agencies. Regulatory bodies include the Alaska Board of Game, Alaska Department of Fish and Game, National Park Service, Federal Subsistence Board, Yukon Territorial Government, and Yukon First Nations. An informal Chisana caribou herd management working group has met numerous times since its formation in 1999, and includes the Alaska Department of Fish and Game, National Park Service, U.S. Geological Survey, Yukon Territorial Government, White River First Nation, Kluane First Nation, Yukon Game Board, U.S. Fish and Wildlife Service, Canadian Wildlife Service, and the University of Alaska. During several meetings of this working group, the need to develop a cooperative management plan was expressed and supported by all parties. To date, a management plan has not been developed, primarily due to agency staffing changes.

COMMENT# 18

Considering the effort so far expended in the conservation of this herd, the complex and multinational array of stakeholders, the diverse international regulatory agencies, and the conservation status of this herd, I urge that the proposal not be supported. A cooperative management plan is necessary prior to any harvest of this herd, and my staff will gladly participate in this effort.

Thank you for your consideration and for the opportunity to comment.

Sincerely,

Meg Jensen

Meg Jensen
Superintendent

cc: Marcia Blaszak, Alaska Regional Director
Judy Gottlieb, Associate Regional Director, Subsistence and Partnerships

COMMENT# 18

RECEIVED
FEB 12 2008
BOARDS

Written Public Comment for
Alaska Board of Game
Spring 2008 Meeting
Fairbanks, Alaska

Dear Members of the Board and Chairman of the Board,

My name is Rob Jones, I live in Anchorage and am a hunting guide, a commercial fisherman and hold over 50 acres of private land in Game Management Unit 19/C. I would like to talk about proposals 9, 15, and 16. I personally wrote these proposals and feel that they would be good changes with no negative impact on the area or the game resources of subject in these proposals. I will also comment on proposals 101, 102, 104, and 106.

Proposal #9 concerns GMU 19/B and 19/C Brown/Grizzly Bear seasons. As with the areas to the north, west, and east of this area that being GMU 16/B, 19/A, and 19/D the population of Brown/Grizzly Bears are at a very high level and are contributing greatly to the population decrease of Moose, Caribou, and Bison. GMU 16/B, 19/A, & 19/D have already opened their seasons earlier and also have increased the bag limits for Brown/Grizzly Bears. With the same problems that these other areas are having I see no reason not to put at least the seasons of 19/B and 19/C in line with these other areas.

Proposal #15 is aimed at reintroducing a winter Moose season in GMU 19/D, that portion between and including Cheeneetnuk and Gagaryah river drainages, excluding that portion within 2 miles of the Swift River, and 19/D remainder, page 82 of the Alaska Hunting Regulations. Many of the winter hunts in GMU 19 have been eliminated due to the decreased population of moose in the unit. This part of GMU 19/D described above, basically the southern portion of 19/D has historically had very little hunting

COMMENT# 19

pressure in the winter and even less harvest pressure. This is an area and a season that could be reopened to residents without fear of over harvest.

Proposal #16 The present **hunting season** for wolverine in GMU 19 is Sept. 1 – Mar. 1. The present population of wolverine in GMU 19 is very good. If the **hunting season** were extended until May 15 it would provide more hunting opportunity while spring Bear hunting in this area. This would not hurt the already healthy population and fur quality of wolverine in this area is still good this time of year.

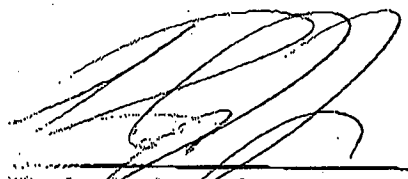
Proposals #101&104, if adopted would extend the implementation time of these predator control plans in units 19/A & 19/D East. I strongly support these proposals and believe that they are making slow but positive results to increase the population of moose in the areas. It is of my opinion that these plans need to be expanded not only in time but also area and number of participants.

Proposals #102 & 106, has been proposed by three organizations that in recent history has oppose any predator control program that has either been proposed or implemented by the State of Alaska. Both proposals request that the board terminate the predation control areas implementation plan or at least remove the wolf control provision of the plan. The reason they have made these proposals is that they believe that the program has not accomplished what it was put into place to do which was to increase the subsistence harvest of moose in the areas. They claim that the program was not monitored or evaluated. This program is strictly watched. When all wolves taken are accounted for and by what methods and means they were taken by. When all bear removal from the area is documented. When cow and calf moose are collared, tracked and data collected about their survival rate. When these programs have proved that predation is

COMMENT# 19

the largest cause of death among cow and calf moose in these areas. I call this a very monitored and evaluated system. Their next concern is the excessive cost to remove wolves from the area. Proposal #106 leads you to believe that the State of Alaska spent 1.7 million dollars to remove 45 wolves from the areas. I have a hard time believing that when a volunteer applies to the State of Alaska to participate in these programs, and the application process is a two-page form and in a very short while he or she is either issued or denied a permit. Once a participant is issued a permit, he or she is not compensated for their time, fuel, supplies, and wear & tear of their equipment, in any way shape or form from the State of Alaska. If 1.7 million dollars was spent on these programs it was probably spent on the bear removal, collaring and tracking of moose, data collecting and documentation to show moose and predator activity in these areas, not the removal of 45 wolves.

I thank you for your time in not only reading these comments but for the endless amount of time and energy you spend to try and make the hunting regulations as fair as possible for all user groups.



Rob Jones Jr.

COMMENT# 19

ALASKA MINERS ASSOCIATION, INC.

3305 Arctic Blvd., #105, Anchorage, Alaska 99503 • (907) 563-9229 • FAX: (907) 563-9225 • www.alaskaminers.org

February 11, 2007

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

FAX 907-465-6094

Re: Proposal 86, Tangle Lakes Area Wildlife Refuge

Dear Sirs,

On behalf of the Alaska Miners Association I **ask that you reject Proposal 86** which proposes a state wildlife refuge in the Tangle Lakes area north of the Denali Highway.

The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry. The AMA is composed of approximately 1200 individual prospectors, geologists and engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, nickel, coal, limestone, sand and gravel, crushed stone, armor rock, etc. Many of our members have worked for several decades in the area affected by Proposal 86 and many have mining claims there.

This area along the Denali Highway has been a focus of mineral exploration since about 1903. Various placer gold mines have operated in the area and several lode deposits have been identified and explored. This area is known to contain gold, copper, nickel, and platinum mineralization. This area has been a major focus for exploration for many years. During the past decade or more, several million dollars have been spent on air and ground geophysical surveys, rock and soil sampling and analysis, geologic mapping, drilling, etc. More than 30 exploration and/or mining permits have been issued for the area of Proposition 86 and adjacent areas during the past few years.

Because this area is of such high potential for valuable minerals, it was selected by the State of Alaska and was placed on the priority list for transfer to the State. This area now contains more than 250 square miles of mining claims held by various companies and individuals.

Previous mining in the area has improved fish and wildlife habitat. Prior to mining, Valdez Creek fish habitat was limited to spring, summer and early fall for grayling and some other species. In some years Valdez Creek would freeze to the bottom killing all fish because there was no over-wintering water. Final reclamation of the Valdez Creek Mine, which in the mid-1980s was the largest private employer in the Mat-Su Borough, included a large lake with deep fresh water which now provides excellent over-wintering habitat. Prior to this lake the fish in the river had to retreat to the Susitna River during the winter.

There is no need for a refuge to protect wildlife. There are all manner of requirements that a company must follow before they can begin mining and many of these are focused on minimizing the impacts on fish and wildlife. If a mine is eventually proposed for the area, it will require a multi-year permitting process involving the public, state and federal agencies. Alaska has a comprehensive, thorough, mine permitting process which has been utilized in the permitting of several major and intermediate size mines. Mining and exploration has occurred in the past with no adverse effects on wildlife. The dangers to fish and wildlife are not due to exploration or mining.

The real dangers to fish and wildlife in the Tangle Lakes area are due to ineffective regulation and control of fishing and hunting activity and to ineffective predator control. Management, not creation of new refuges is what is needed. This management will be required no matter what other activities are in the area. Examples abound of wildlife moving into areas with people because of predation by wolves and bears. This was the case at Valdez Creek Mine where each year moose calved right adjacent to large bulldozers working on reclamation. Mining and exploration were not the problem then and they will not be the problem in the future.

State planning efforts for the region occurred in 1985 and 1991. Local Area Plans include mining as an expected use. Companies have relied on these plans when deciding where to invest their scarce exploration dollars. Also, mineral development is important to help the State diversify its economy. Most areas of the State do not have oil, gas or timber resources that can be developed and tourism is feasible only for limited periods of time each year.

Alaska has millions of acres that are already in federally designated parks, preserves, refuges, monuments, wildernesses, etc. where nearly all human activity, other than hiking, fishing and some restricted hunting, is prohibited. The amount of federal land in Alaska that is legislatively closed to mining is huge - it is equal to the combined total acreage of the states of New York, New Jersey, West Virginia, Ohio, Indiana, and Illinois. Additionally, the State has several million acres already designated as parks and refuges. **No more refuges or other set-asides are needed or justified!**

Many of the lands within the various set-asides are highly prospective for mineral development but these are totally off-limits to development. Those lands that remain available for mineral development must stay that way and not be encumbered with refuges or any other restrictive land use designation.

We urge you to reject Proposal 86.

Sincerely,

Steven C. Borell, P.E.
Executive Director

Cc: Commissioner Denby Lloyd
Commissioner Tom Irwin

COMMENT# 20

February 10, 2008

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Attn: BOG Comments
Ref: Proposal 86

To Whom It May Concern:

I am writing to encourage your department to create a Tangle Lakes State Wildlife Refuge. My family has lived in Alaska 33 years and has enjoyed many parts of Alaska. We find this area to be a very special place for many reasons. We have fishing, berry picked, hiked, boated and ridden our horses in this beautiful and wonderful area. It has been a traditionally important area for people and animals for thousands of years. The archeological record speaks for itself and it would be such a shame to damage such a pristine environment.

We live and own a farm in the Copper River Valley and I am aware of many folks who use this area for many reasons. There isn't a time that goes by, be it winter or summer, that I don't hear of someone using the area. Whether they are dog mushing, hunting, berry picking, boating, hiking or camping, it is being used. Please protect and keep this area with its traditional uses and not damage it beyond repair. Thank you for your consideration.

Sincerely,

Kathy Libbey

Kathy Libbey
HC60 Box 280
Copper Center, AK 99573

Cc: Governor Palin
Senators: Kookesh and Therriault
Representatives: Salmon and Harris

purenickel

February 4, 2008

ATTN: BOG Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

RECEIVED
FEB 13 2008
BOARDS

Re: Correcting the Facts about Proposal 86: Denali Highway Area Wildlife Refuge

Dear Sir or Madame:

This letter corrects misinformation provided with Proposal 86: Wildlife Refuge for the Denali Highway. Some information in the proposal is in error; some is incomplete. This letter corrects those errors and provides complete information to inform the discussion on the proposal. We believe that an accurate portrayal of the facts and circumstances that surround the proposal will prompt the Board of Game to reject it.

While this letter addresses factual information concerning the proposal, Pure Nickel Inc. is submitting another letter with our comments on the proposal.

Summary. Below is a summary of the errors in Proposal 86 and its support information:

- ***Error: State agencies lack authority to protect wildlife from mining.***
  Correction: State agencies DO have authority to protect wildlife during the mine permitting process.

- ***Error: Proponents describe the proposed Refuge area as Critical Habitat.***
  Correction: Published material from DF&G shows the area lacks Critical Habitat.

- ***Error: The Proposal Neglects to Mention the Protections of DNR Special Use Area.***
  Correction: DNR has an administrative area that almost wholly overlaps the Refuge.

COMMENT# 22

Pure Nickel Inc. 95 Wellington St. W., Suite 900, Toronto, Ontario, Canada M5J 2N7
T: 416.644.0001 F: 416.644.0069 E: info@purenickel.com W: www.purenickel.com

Error: State agencies lack authority to protect wildlife from mining.

The proposal strongly implies that DNR "does not have authority to make stipulations to prevent impacts to mammals — only to fish[1]." That is just not the case. The background information for Proposal 86 justifies the proposal as a method to give the state authority it would otherwise lack. However, DNR has full authority on state land to impose stipulations on mining exploration or development proposals to protect wildlife habitat and hunting use. In fact, DNR imposes them on a regular basis.

For example, there are mineral licks north of the Proposal 86 area that DNR and DF&G concluded was critical habitat for sheep. In the nine square miles surrounding the mineral lick, the DNR Area plan requires that before DNR can approve a permit, the applicant must show how "direct or indirect impacts on the mineral licks and wildlife trails *will be avoided...*" In other words, DNR will not permit mining or exploration if significant impacts to that critical habitat cannot be avoided. However, the agencies apparently did not determine a need to enact such rules for the habitat within the area of the proposed refuge.

The assertion that DNR lacks authority to prevent impacts to mammals is just wrong. Other example stipulations used by DNR to protect wildlife include timing restrictions, requiring access to be by air rather than road, avoiding certain areas, re-routing access, etc.

Error: Proponents describe the proposed Refuge area as Critical Habitat.

Some proponents have asserted that the area of the proposed Refuge is "critical habitat." In fact, DF&G's analyses show that critical habitat exists but only outside the proposed refuge and along its eastern border. DF&G determined that most of the refuge does not contain critical habitat.

The Department of Fish and Game provides the fish and wildlife expertise for DNR's Area Plans.[2] As part of these area plans, the agencies rated the habitat in each area and sub-area into one of five categories. The lowest-value habitat is labeled "Important Habitat," the middle two categories are labeled "Prime Habitat." and the two highest-valued habitats are labeled "Critical Habitat.[3]" The agencies conducted three multi-year public processes as a part of the Area Plans.

---

[1] The proposal actually says that DNR's Office of Habitat Management and Permitting has authority to impose stipulations to protect fish, but not mammals. What it does not say is that the Division of Mining, Land and Water within DNR has full authority to impose stipulations to protect mammals such as caribou or moose. The Office does have the authority to recommend stipulations to the Division of Mining, Land and Water. By excluding that information, even if by error, it leads the reader with the impression that DNR lacks authority to protect wildlife. That is just not the case. In addition, the proposal fails to mention that the Habitat biologists, when they were in DF&G and in DNR, have not recommended stipulations other than those applied to the permit.

[2] The Commissioner of DF&G signs the Area Plan in recognition, in part, of the agency's participation. The Tanana Basin Area Plan was signed by Ron Somerville for the Department of Fish and Game in 1991.

[3] The plans rate habitat into two categories of Critical Habitat, A-1, and A-2; two categories of Prime Habitat, B-1 and B-2; and one category of Important Habitat, C-1. Almost all of the Proposed Refuge is rated B-1, the very middle of the five habitat categories.

COMMENT# 22

The habitat ratings were published for public comment. The Tanana Basin Area Plan was signed in 1985 and updated in 1991. The Copper River Basin Area Plan was signed in 1986.

DF&G did determine that Critical Habitat exists in the region but not in the heart of the proposed refuge area. The Copper River Basin Area Plan determined that the area around Summit Lake (Unit 28A), within the Proposed Refuge in Critical Habitat for Caribou. But it is less than 10% of the proposed Refuge area and is along the eastern border. The Tanana Basin Area Plan, which includes most of the proposed Refuge area, determined that north of the Denali Highway outside the Proposed Refuge Area contains mineral licks that are Critical Habitat for sheep. But the rest of the area is rated Prime Habitat — the middle habitat category. Thus, DF&G's official position determined through three, multi-year Area Plan analyses is that critical habitat for caribou and sheep exists in the region, but that more than 90% of the Proposal 86 area is not critical habitat for any species.

Error: The Proposal Neglects to Mention the Protections of DNR Special Use Area.

The proposal neglects the fact that this area already receives special protection from state agencies. Most of the proposed refuge area is within DNR's Tangle Lakes Archaeological District Special Use Area. The Special Use Area does not specifically address questions of wildlife and mining, because that issue is appropriate for the permit process. However, the Special Use Area is an already existing administrative designation that DNR could use to enact special rules should additional rules become necessary.

In 2003, before the state took title to much of this area, it enacted the Tangle Lakes Archaeological District Special Use Area [11 AAC 96.014(24)]. Before the state received the land from the federal government, DNR assessed the area and potential impacts to the land and determined that the area needed special protection, not because of its habitat, but because of the many cultural and heritage sites in the area.

The agency reviewed likely impact to the area, and concluded that mining was not likely the significant impact. Specifically, DNR concluded that mining and mineral exploration impacts were easily controlled through its extensive permitting and inspection process. DNR, like BLM before it, concluded that unrestricted motorized recreation had the greatest potential to cause significant habitat impacts. For that reason, DNR enacted rules for recreation and received additional legislative funding for field personnel to manage this area. DNR also enacted a leasehold location order for mining. This order addresses compatibility of mining with cultural resource, but expects specific details to be worked out through the permitting process.

DNR's Special Use Area does not have specific rules for mining and wildlife conflicts because that issue has not been a problem. However, the administrative designation provides a vehicle for special rules should those rules become necessary.

Other, Less Important Errors

The support material for Proposal 86 also misrepresents the DNR's Area Plans and the agency's decision to take conveyance of the land from the federal government. While the information is not crucial to the discussion, it is sometimes used to mischaracterize the Area Plans as supporting the Refuge Proposal. They do not.

Area Plans. The background material for the proposal indicates that, according to the DNR Area Plans, "the primary use for these lands is fish and wildlife habitat. Mining is an allowed use, but not a primary use." That description is not completely accurate.

Most of the Proposal 86 area is within the DNR's Tanana Basin Area Plan (the southeastern portion is within the Copper River Basin Area Plan).

The Area Plans provide management direction separately for the land estate (i.e., surface uses such as recreation, habitat, forestry), and the mineral estate (i.e., oil and gas, mining). These are separate. The Plans' provide two primary management intents for the *surface uses*: Public Recreation and Wildlife Habitat. For subsurface uses, the plan makes the decision that area should remain Open to Mineral Location. The subsurface use is not subordinate to the surface use. The mineral use is not subordinate to the public recreation and wildlife habitat. They are different. When DNR goes through the permit process, it needs to take the primary surface uses into account. But the statement that "Mining is not an allowed but not a primary use" is not wholly accurate. The surface and subsurface are two separate designations.

The Area Plans did determine that some of the area should be closed to mineral entry; specifically, the area surrounding Fielding Lake on the eastern border of the Refuge Proposal. For most of the Proposal 86 area, the plans determined that the area remains open to mining.

DNR's Conveyance Decision. The background material implies that DNR decided in 2003 to take ownership of the area in spite of public comments asking that wildlife be protected from mineral exploration. That is a part of the story, but it misrepresents what happened.

Since statehood, DNR has been selecting land valuable for the state. Much of the Denali Highway Region was selected many years ago, and much of it was selected because of its mineral value. Through multi-year planning processes done in the 1980s and early 1990s, DNR confirmed its decision that the state should eventually own the land. In 1994, DNR after another round of public notice and comment, DNR made its final selections and again confirmed that the area should be state-owned because of its multiple public values.

In 2003, individuals asked the state to take ownership immediately. The issue confronting DNR was then: should the state take ownership in 2003 or wait until later? The few individuals who contacted DNR asked the agency to ignore the results of multiple public processes and not to take ownership at all, when in fact the decision facing DNR was only about timing: ownership in 2003 or later? Finally, DNR felt that the questions of mining were best decided in a permit process. The decision of when to take ownership of the land Alaskans deserve was not the right place to make decisions about how to mitigate impacts from a mine that has not yet been proposed.

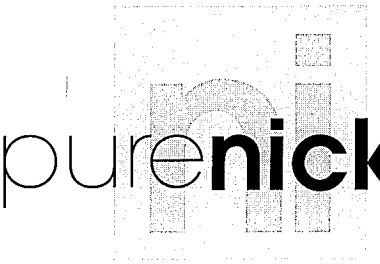
COMMENT# 22

Thank you for the opportunity to correct the record. I believe that a full understanding of the facts will make for a more informed discussion. Pure Nickel Inc. is also providing another letter to express specific reasons for opposition to the proposal.

Sincerely,

Robert Angrisano
Chairman of the Board
Pure Nickel Inc.

COMMENT# 22



February 4, 2008

ATTN: BOG Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

Re: Opposition to Proposal 86: Denali Highway Area Wildlife Refuge

Dear Sir or Madame:

I am writing to ask you to reject Proposal 86: a Wildlife Refuge north of the Denali Highway. The proposal is an attempt to end-run the state's mine permitting process — a process that is well respected and protects Alaska's important natural resources. It pretends that there is a current reason to act when there is no reason why any action would be needed for many years into the future. The proposal is also illegal; it is an unconstitutional taking of private property rights. Finally, the proposal would rob many Alaskans of the chance to earn their living in a manner that uses our resources but protects the environment. I would like to take this opportunity to explain.

A History of Exploration with Little Environmental Impact

A Century of Mineral Exploration in the Region. The Denali Highway Region has been the subject of mineral exploration since the turn of the century. The large Valdez Creek Mine, just east of the Susitna River, was discovered in the early part of this century and reclaimed in the early 1990s. Other exploration has gone on in this region, including the Proposal 86 area, for decades. In the early 1990s, modern mining exploration increased in this region. The exploration companies have included American Copper and Nickel Company (ACNC), Anglo American, Fort Knox Gold (a different company than the one mining near Fairbanks), Nevada Star Resource Corp., which, in March 2007 changed its name to Pure Nickel Inc., and a few others.

Since 2000, DNR has granted 19 exploration permits and 19 permits for placer mining in the region. While most are within the region but outside the proposed refuge area, some include work within the Proposal 86 area.

A Legacy of Minimal Impact. Exploration has included most of the techniques used to find hard-rock minerals including field mapping, aerial and ground geophysical exploration, soil samples, water samples, rock sampling, and exploration drilling. Almost all of the recent exploration has been helicopter supported. It has left little ground disturbance or long-term

Pure Nickel Inc. 95 Wellington St. W., Suite 900, Toronto, Ontario, Canada M5J 2N7
T: 416.644.0001 F: 416.644.0069 E: info@purenickel.com W: www.purenickel.com

visual affect. Neither DNR nor DF&G have suggested to the companies involved that the exploration has caused significant effects on recreation or wildlife. While some changes occurred during the permitting process, we are not aware that DF&G has suggested additional significant stipulations on the permits.

Status of Exploration. There is no hardrock mine currently proposed anywhere in the Denali Highway Region. While there are enticing exploration prospects, no company has yet even announced a significant mineral find that would justify a mine or even advanced exploration. Of course, we hope to do so, but there is no find yet.

Decades of Low-Impact, Extensive Exploration with little disturbance of Wildlife or People does not justify a prohibition. According to DNR field personnel, few if any of the public even know that mineral exploration has been occurring in the area. Few, if any, notice any impacts, and there has been no record of significant impact to wildlife. This record does not justify the need for additional regulation and protection.

The Permitting Process is the Appropriate Place to Discuss Impacts — not an end-run Refuge Proposal

Today, we do not know whether a mine will ever be proposed of the area. If one is proposed, we have no idea what the proposal will look like — its impacts could be large or small; above- or underground. It could be within the Proposal 86 area, just on the edge, or outside of it. If a mine is proposed, we do not know if it will be capable of being permitted. Just because a proposal is made does not mean the agencies can approve it. The right time to discuss the impacts is when Alaskans know what the impacts will be — not when Alaskans discuss impacts they do not know and only imagine. The Refuge Proposal is an unnecessary end-run around Alaska's legitimate permit process.

Currently, mineral exploration includes the Proposal 86 Area, but it is not particularly focusing on that area; rather, it occurs throughout the broader region north of the Denali Highway and east of the Tangle Lakes. If a mine is eventually proposed for the area, a mine proposal will be evaluated through a multi-year permitting process involving the public, state agencies — DNR, DF&G, and DEC — and almost always includes the federal agencies as well.

All mines are different. So it is not possible to forecast either the exact impacts or exact process for some hypothetical mine that may eventually be proposed for the area. But some general principals about the permitting process are true:

- *Mines take a long time to develop — the discussion may go on for a decade or more.* No mine has been authorized and begun operating in less than a decade after a find has been announced. Most have taken decades to go from exploration to operation. No find has been announced in the Denali Highway Region. Even if one was announced tomorrow, there is a long time — at least a decade and likely more, before a mine can begin operating. There is a long time to consider impacts when they are actually known, and it is inappropriate to do anything today.

- *The Permitting Process Is A Multi-Year Process Involving the Public, State, and almost always federal agencies.* Should a mine be proposed, the public and all state agencies — including DF&G — will be involved in a long discussion concerning impacts to wildlife. The agencies have authority to impose stipulations to protect wildlife. There is no need to short-circuit such a discussion. Should a mine be proposed, there are years to investigate the impacts, discuss whether the proposal can be authorized, and to discuss appropriate stipulations and mitigation.

- *An example of Mine Permitting: Pogo.* Many Alaskans witnessed the mine permitting process through the 3½-year process that resulted in the Pogo Mine. The process included dozens of formal and informal public meetings, environmental impact statement, multiple opportunities for formal public comment, and extensive analysis by state and federal agencies including: DNR, DF&G, DEC, U.S. EPA, U.S. Army Corps of Engineers, and others. That process was anything but a rubber stamp. It resulted in significant design changes plan to protect the environment, and a mine that works for the local citizenry and the environment. It is important to remember that just because a mine is proposed does not mean it will be authorized. Alaska has a history of mine proposals that are never authorized or go into production.

In summary, Alaska has a comprehensive, effective mine permitting process. That is the appropriate time and place to discuss mining impacts. To date there have been no significant impacts to the environment; none are expected in the near future. Whether there will eventually be such a discussion is anybody's guess. I hope that Alaskans will have that discussion in the future. But the right place for it is the permitting process, not an end-run of the process by establishing a Refuge to prevent peoples' illusions of what impacts may or may not be.

Proposal 86 is Illegal

Proposal 86 "disallows hard-rock mining." The proposal creates a Wildlife Refuge and prohibits mining with the Refuge. However, the area proposed is blanketed with mining claims.[1] Mining claims are a valid property right. It is certainly legal for state agencies to conclude that a particular mining proposal does not meet realistic permit standards and to turn down an application for mining for that reason. However, it is not legal to enact a blanket prohibition on the use of private property without paying for it.

That is why all legislative designations exempt valid existing rights. If a Refuge in this area were to exempt valid existing rights, the refuge would have little or no meaning. In this case, almost the entire Refuge would be exempted from the Refuge — it would be a Refuge without an area. If, however, valid existing rights are not exempted, the proposed refuge's blanket prohibition on the use of the mining claims is a constitutional taking. It is an invalid exercise of law.

[1] Some of the property rights are "leasehold locations" rather than mining claims. There are some technical differences between leasehold locations and mining claims. But both are property rights. For purposes of this discussion, there is no difference.

COMMENT# 22

The correct and legal method to protect wildlife is to evaluate any mining proposal — should one eventually be proposed — through Alaska's rigorous permit process. The method proposed by Proposal 86 — to prohibit the use of a valid private property right — is not legal.

A Positive Economic Impact for Alaskans

We cannot give you the full economic value that mineral exploration has had in this region. We lack the information and payroll from other companies' programs. However, Pure Nickel Inc. has had an important impact to the Alaskans who have worked with us over the years.

The number of Alaska residents has varied each season. Since 1995, Pure Nickel Inc. and its Joint Venture partners have invested over $20 million dollars in exploration for mineral opportunities in the area. The majority of this money has been paid to Alaskan businesses, residents, service providers and has employed several hundred Alaskan residents. In 2007, Pure Nickel spent almost $4 million dollars on exploration in this area and continues to view this area as one of the most promising properties in its portfolio.

In addition, each year we pay lease fees to hole our claim, over $181,910 per year to the state of which more than $90,000 per year has gone to the Alaska Permanent Fund and increased dividends for all Alaskans.

These expenditures are important for the Alaskans who supply our company, and for the individuals who work with us. It is important to note that our work does not come at the expense of Alaskans' recreation and hunting. We have not displaced Alaskans who use the area. Rather, it has come in addition to what the recreation and hunting money spent in the area.

A Proposal with Errors

The material supplied with Proposal 86 includes a number of important errors. I have submitted a different letter to correct the record so the Board of Game can debate the proposal with accurate information. The major factual errors in the proposal are summarized below:

- *Error: State agencies lack authority to protect wildlife from mining.*
  Correction: State agencies DO have authority to protect wildlife during the mine permitting process.

- *Error: Proponents describe the proposed Refuge area as Critical Habitat.*
  Correction: Published material from DF&G shows the area lacks Critical Habitat.

- *Error: The Proposal Neglects to Mention the Protections of DNR Special Use Area.*
  Correction: DNR has an administrative area that almost wholly overlaps the Refuge.

Please see the accompanying letter for more detail on these factual inaccuracies.

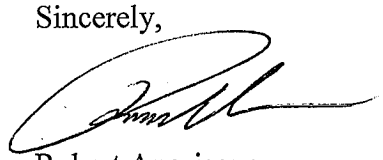
Conclusion

I urge you to reject Proposal 86. This letter and the accompanying letter concerning factual errors in the proposal material provide reasons to oppose the proposal.

In summary, the proposal is illegal; it is an unconstitutional taking of private property rights. It mis-presents agency authorities to prevent impacts to wildlife. It establishes a refuge where DF&G has determined that critical habitat is absent. It pretends impacts where none have occurred. It robs a number of Alaskan employees and businesses of income and livelihood. It ignores and changes the results of three multi-year DNR Area Plans.

But the most important reason to oppose the Refuge Proposal is that is an inappropriate end-run around Alaska's legitimate large mine process. No one knows what when or whether a mine will actually be proposed. It may be proposed within a decade or so, or perhaps decades from now when technology and land use are very different. No one knows what the impacts will be for a hypothetical mine that may be proposed in many decades. The right time to discuss those impacts of any mine proposal is once we know what the proposal is not now. This Refuge attempts to end run Alaska's legitimate large mine process. It ends real public discussion. It is fundamentally anti-democratic, and you should reject it.

Sincerely,



Robert Angrisano
Chairman of the Board
Pure Nickel Inc.

COMMENT# 22

Alaska Board of Game Region III Meeting
Feb. 29 - March10, 2008

RECEIVED
FEB 13 2008
BOARDS

Red Devil Traditional Council Proposal Comments

Proposals 8, 9, 83, 99, 100, 103, 105, 112, 137, 138 - Supported. The Red Devil Traditional Council, (RDTC), supports proposals that encourage and increase the harvest of predators, due to the decline in moose stocks in GMU 19, and many other areas of the state. When advisory committees in an area sponsor these sort of proposals or proposals to start new comprehensive predator management plans, it is evident that predator management is needed there and RDTC supports them.

Proposals 101 & 104 - Supported. These proposals are to extend the 2 predator management programs for several years - in GMU 19 A, and 19D. These programs are working, but need more time.

Proposals 102, 106, &113 – Opposed. These proposals are attempts to terminate 3 predator management programs. These programs are effective and require more time. The state went through a long period with NO predator control for 11 or 12 years. It is unrealistic to expect there to be a large harvestable surplus in so short a time period

- All 3 claim they have not been effective in increasing moose harvest. **In Prop 102, (19A), a closure and Tier II have been put in place. How could hunter harvest possibly have increased there??**
- Also claimed is that these programs are too expensive. **They are not when compared to what it would cost if the ban initiative were passed, and ADF&G personnel were required to do it!**

Proposals 12 & 14 – Opposed. Both of these proposals eliminate antler restrictions and lengthen the moose season in 19B. The sponsor of Proposal 14 didn't get a moose. If these hunters are having trouble getting spike/fork moos in 19B, it is evident that the 19A moose closure needs to be extended into 19, as the Sleetmute Traditional Council, (STC) testified when it made the 19A/B closure proposal 2 years ago . There is no recent information on population density and composition in 19B. Keeping the spike/fork restriction is necessary to insure that some moose are left for recruitment.

Proposal 13 - Supported. (See RDTC comments on 12 and 14.) This Central Kuskokwim Advisory Committee, (CKAC), proposal speaks for itself, and is also supported by the comments made by the Stony Holitna Advisory Committee, (SHAC). This is what STC **Proposal 64** addressed at the Spring, 2006 BOG meeting 2 years ago.

Proposal 87 – Supported. The Holitna-Hoholitna Controlled Use Area is definitely NOT "a frivolous regulation" as its sponsor said. Hunters who live outside of 19A The people living within 19A use much smaller outboard motors for their transportation and hunting due to cost of larger motors, cost of fuel, and lack of jobs and income in the area. There is also no commercial fishing in 19A.
The SHAC comments on this proposal list most of the reasons the 40 hp limit was imposed in the first place.
Making a proposal like this – that would increase the amount of hunting pressure at the present time - when the resource is depleted to the point it is now – would work in opposition to moose population recovery.

COPPER COUNTRY ALLIANCE
HC 60 Box 306T
Copper Center, Alaska 99573
Phone (907) 822-3644 Fax (907) 822-3644
cca@coppervalleyak.net
a 501(c)(3) non-profit corporation
"Protecting the rural and wild natural environment of the Wrangell Mountains/Copper Basin region."

February 13, 2008

ATTN: BOG COMMENTS
Alaska Department of Fish & Game
Boards Support Section
By Fax to 907-465-6094

RECEIVED
FEB 13 2008
BOARDS

Re: Proposal #86--Support

Gentlemen:

We are a volunteer conservation organization based in the Copper River Basin. Almost all of our members are Copper Basin residents; all are Alaskans. Most of us hunt or have hunted the Nelchina caribou herd. It is an important food source for us and a key link in the Copper Basin's food chain. All of us also enjoy seeing these animals, whether along the Glenn, Richardson or Denali Highway, or in the backcountry.

A map showing results of a recent in-depth study of the Nelchina caribou herd by ADFG and USGS biologists showed that, during the five-year study period, ***the Tangle Lakes area was the most-used caribou wintering habitat in Unit 13.***

We strongly support Proposal 86, which would create a Tangle Lakes State Wildlife Refuge.

At last spring's Board of Game meeting, we and more than fifty others wrote letters of support for the refuge. These were not form letters. Almost without exception, the writers mentioned their own experiences (often hunting experiences) in the Tangle Lakes area.

We wish to address some of the issues raised by those who were opposed to last year's proposal:

Issue #1: Can the refuge bar mining on valid existing claims?
At last year's meeting, a major concern of those opposed to the refuge was that it would prohibit large-scale hardrock mining. There was a concern that holders of existing hardrock mineral claims would bring an expensive lawsuit against the state, and/or that the state would have to buy up those claims. A way to resolve this issue is to allow existing claims to continue, but to disallow the staking of new hardrock claims. (If current claims lapsed, they could not be re-staked.)

Therefore, we suggest the following change to the Proposal 86 stipulations for the refuge:

Replace the sentence, "The refuge is closed to hardrock mining," with

The refuge is closed to hardrock mineral entry.

COMMENT# 24

The phrase "closed to mineral entry" means, according to the glossary of the state's Tanana Basin Area Plan, "Areas where the staking of new mineral claims is prohibited because mining has been determined to be in conflict with significant surfaces uses in the area. Valid existing mineral claims at the time of plan adoption are not affected by mineral closures."

Issue #2: Would the refuge take in all of the claims block?
No. Proposed refuge boundaries stop short of Eureka Creek and Fish Lake, where all the drilling in the past three years has been done. Rainy Creek and Broxson Gulch are also north of the proposed refuge boundary.

Issue #3: Without a refuge, will the Department of Natural Resources effectively protect the Nelchina Caribou herd?
We believe that it will not, because:

1. Unlike ADFG, which is staffed with the State's wildlife experts, DNR's main mission is resource development, not wildlife protection.
2. Even when the Habitat Division is transferred back to ADFG, Habitat biologists will be limited to making stipulations that protect fish, not mammals.
3. While the Division of Mining, Land and Water can place stipulations regarding mammals on exploration permits, it has not done so in three years of writing exploration permits for these claims. Some of these permits included drill sites less than three miles from Tangle Lakes (although those sites have not been drilled).
4. Alaska's permitting process is not viewed as rigorous by those outside Alaska. For instance, a survey conducted in the mineral industry by the Fraser Institute (Canada) ranked Alaska 4th among 14 U.S. mining states for environmental regulations that do not deter mineral exploration investment. And Pure Nickel's website says of Alaska: "mining-friendly state; expedited permitting process and relatively low costs".

A refuge administered by the Department of Fish and Game would give significantly more protection than can be expected under current DNR land management.

Issue #4: Does the Tangle Lakes Special Use Area (SUA) offer sufficient additional protections?
No. The SUA covers only part of the proposed refuge; it is administered by DNR; it doesn't offer additional protection for wildlife except in requiring a permit for using motorized vehicles off designated trails between May 18 and October 18.

Issue #5: Does the Board have the authority to designate a refuge?
Yes. **The very first sentence** under Alaska Statutes [Sec. 16.05.255] dealing with the Board of Game says, "The Board of Game may adopt regulations it considers advisable in accordance with AS 44.62 (Administrative Procedure Act) for (1) setting apart game reserve areas, refuges, and sanctuaries in the water or on the land of the state over which it has jurisdiction, subject to the approval of the legislature." The Board of Game is the logical place for full discussion.

The Board of Game has the ability to safeguard this important area for the benefit of hunters and other wildlife users. We urge you to take the vital step of designating this refuge.

Sincerely,

COPPER COUNTRY ALLIANCE

Ruth McHenry

Ruth McHenry, volunteer staff

COMMENT# 24

Ruth McHenry
HC60 Box 306T
Copper Center, Alaska 99573

February 13, 2008

ATTN: BOG COMMENTS
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

By Fax to: 907-465-6094

Re: Support Proposal #86

Gentlemen:

I have lived in Alaska for all but a few months of my 62 years. Beginning in my teenage years, I have visited the Denali Highway many times. When my husband, Ted McHenry, and I moved to the Copper Basin in 1988, the Nelchina caribou herd became our principal source of meat. It was always a pleasure to go along on Ted's hunts in the Denali Highway area. Its open vistas, its easily-hiked ridges, and its abundant wildlife made for many good experiences. Although Ted is dead now, I continue to visit the Denali Highway and Tangle Lakes, usually about three times a year.

Over the years, I've noticed that Alaskans have a special affinity for the Tangle Lakes and Denali Highway. Just like me, many Alaskans go back again and again.

It is important that the area's high values--hunting, recreational, wildlife, and scenic--remain intact for future generations. Today, it is large-scale mining that threatens those values. Tomorrow, it could be some other development that is a poor fit with wildlife, their habitats, and the ways that many Alaskans have been using the land.

A state refuge is the best tool I can think of for guarding the values I mentioned. Proposal #86 does not threaten hunting; rather, it protects hunting by giving some new protections to wildlife and their habitats.

Please approve Proposal #86.

Sincerely,

Ruth McHenry

Ruth McHenry

COMMENT# 25

REGION III PROPOSALS

TOM LAMAL
1734 Becker Ridge Road
Fairbanks, Alaska 99709
(907) 479-7544
tomlamal@yahoo.com

RECEIVED
FEB 14 2008
BOARDS

Proposal #26 DISAPPROVE Amend – Keep antler restrictions the same except make it three brow tines for residents for the entire area of Unit 20A.

Proposal # 85 APPROVE but would like to amend.

I would like to amend my own proposal due to the positive feedback I have received.
DATES:
RESIDENTS: August 5th. – September 22nd.
NON-residents: August 10th. – September 20th.
I have received phone calls from all over the state and the general consensus is two days is not enough time and five days or longer would be more acceptable. I have not received one negative comment on this idea, so I feel quite confident the Board of Game will approve proposal 85 and hopefully make it a state wide date in two years.

Proposal # 89 DISAPPROVE - See comments below for proposal 90 – no motorized access!

Proposal #90 DISAPPROVE – comments for proposals 89 & 90 below

Please do not allow the Wood River Controlled Use Area to be opened up to motorized vehicles. I can't believe anyone would entertain this idea considering the irreparable damage that has been done to the Rex Trail and surrounding area along the Wood River. This area is much more valuable in its present un-rutted state. Once this area is opened up – something unique will be lost permanently – "no turning back the clock." Doesn't anyone know how to walk anymore when they go hunting – areas of traditional hunting should be preserved for outdoor enthusiasts. There are other motorized areas available for those who need an ATV for transportation.

Proposal #130 Disapprove of Anterless Hunt

If cows must be harvested take cows only with no calves – absolutely not bulls! The cows harvested should only be harvested from the high density areas of Zone 4 & 5 (south portion) and the middle of Zone 2. The season should close before the bulls lose their antlers. If cows are harvested – limit the number to 200. Fish and Game does not appear to be as focused about taking a high number of cows across Unit 20A. Leave the antler restrictions in place – spike, fork, 50 with three brow tines for residents and 50+ with four brow tines for nonresidents. Make all of 20A three brow tines for residents.

COMMENT# 26

MATANUSKA VALLEY SPORTSMEN, INC.
P.O. BOX 1875
PALMER, ALASKA 99645
NRA AFFILIATED
RANGE PHONE: 746-4862
FAX: 746-5039

February 13, 2008

RECEIVED
FEB 14 2008
BOARDS

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Sirs:

This organization of 972 members is extremely concerned about the Game Board decision to manage people instead of predation to meet the sustained yield principle of maximum benefit for residents.

We believe the determination to prevent hundreds of residents from having the opportunity to enjoy a holiday in the mountains to scout for a trophy sheep, even though the chance of success is small, is exactly the opposite of the directive residents demand of the Game Board.

In the 50's the Federal Wildlife had a very effective predator control program and the population of wild sheep became numbered in the 10's of thousands. Historical data shows that predator control is effective.

As residents of this state we look to the Board of Game to act in the best interest of the people not the easiest way out for the employees we hire.

We will be extremely critical of any attempt to eliminate the maximum public participation in pursuit of game harvest.

Respectfully,

Stephen A. Montgomery

Stephen A. Montgomery, President
Matanuska Valley Sportsmen, Inc.

COMMENT# 27

THE MATANUSKA VALLEY SPORTSMEN ARE DEDICATED TO FIREARMS SAFETY EDUCATION AS A PUBLIC SERVICE; MARKSMANSHIP TRAINING AS A CONTRIBUTION TO INDIVIDUAL PREPAREDNESS FOR PERSONAL AND NATIONAL DEFENSE; AND THE SPORTS OF SHOOTING AND HUNTING AS WHOLESOME FORMS OF RECREATION.

February 10, 2008

ATTN: BOG COMMENTS
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

Re: Proposal # 86

Dear Board Members,

I strongly support Proposal 86, which would help to establish the Tangle Lakes State Wildlife Refuge.

My reasons for this support are several, and date back some 37 years when I first visited the Tangle Lakes area during the fall hunting season. Since then, I have had many enjoyable visits there for canoeing and kayaking, camping, fishing, hunting, and berry picking. Many other folks have also enjoyed this very special place as their primary outdoor recreation area.

Because of the unique qualities of the Tangle Lakes area, especially as a key habitat for the Nelchina caribou herd, Tangle Lakes deserves the appropriate stewardship which a State Wildlife Refuge would provide. We need to safeguard this important area for its inherent value for wildlife, and the special opportunity it provides for so many Alaskans to enjoy it.

I urge you to take positive action on this important proposal.

Thank you for the opportunity to comment.

Sincerely,

Fran Mauer
791 Redpoll Ln
Fairbanks, AK 99712

Betsy Chronic
974 High Grade Way
Fairbanks, AK 99712

2-10-08

RECEIVED
FEB 15 2008
BOARDS

Dear Board Of Game Member,

As a non-hunting hiker who values wildlife in Alaska, also who studied wolf behavior in Indiana at Purdue University at the "Wolf Park", I feel my views should be considered regarding the 2008 BOG proposals. Wildlife in Alaska impacts us all, and there should be at least one non-hunter on your Board. I believe predators like wolves and bears play an important role in ecology, by eating the old, weak and injured, keeping the prey gene pool strong. Human hunters, if they shoot only the biggest and strongest bulls, weaken the gene pools. Somewhere in there should be a balance. Here are my comments on the 2008 proposals:

Proposal 20- opposed.
We hike alot in the 20 mile area from the roads and think bears attracted to bait stations create a danger .

Proposal 38- support.
I have seen a lot of damage to terrain in that area, and with new vehicles out that can go even more places, they need to be stopped before more damage occurs.

Proposal 42 - opposed.
I believe brown bears can live among humans to a certain extent. We had a few around Fairbanks last summer but no people were attacked or even threatened.

Proposal 52- opposed.
Wolf control should be proposed by scientists as a tool, not by the hunters and trappers .

Proposal 61- opposed.
I think one good thing has been establishing a non-hunting corridor up the Dalton.This should include wolves. I and many wildlife viewers would enjoy seeing them while hiking or skiing in that area.

Proposal 86-STRONGLY SUPPORT!!!
I and friends have hiked a lot in that area and enjoy its wild beauty and abundant wildlife. I strongly support this proposal,as I believe mining will clearly damage the area, as it has Valdez Creek.

Proposal 102- support.
I don't like aerial wolf control, probably based more on ethics than on science- because it seems too unfair. Also, I feel it is a huge waste of airplane fuel, and I think it is hard to tell what airplanes are really harassing as they cruise around looking for wolves.

Proposal 103- opposed.
Again, for me this is more of an ethical issue, because after studying their behavior at the "Wolf Park" I found wolves to be interesting and amazingly intelligent, so I value them highly.

Proposal 106- opposed.
The groups that made this proposal followed it up with a lot of sound advice. At 38,000$ per wolf, aerial wolf control is a waste of tax-payers money.

Proposal 108- opposed.
It seems crazy to eliminate useful predators while also trying to reduce moose in a prey overpopulation situation. Wolves can reduce the population from the bottom up.

COMMENT# 29

Proposal 113-support.

I feel these aerial wolf control programs are a waste of fuel and money, and that wolves should be respected and admired for their role in the ecosystem, not gunned down from planes by men using them for target practice.

I know I had a lot of views on a lot of proposals, but thank you for taking my comments, and I hope you come to well considered decisions. Thank you-

S. Betsy Chronic

Betsy Chronic

Betsy Chronic
974 High Grade Way
Fairbanks, AK 99712
greslin @ gci.net

COMMENT# 29

United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
Office of Subsistence Management
3601 C Street, Suite 1030
Anchorage, Alaska 99503

OSM/8021.TK

Mr. Cliff Judkins, Chair
Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

FEB 15 2008

Dear Chairman Judkins:

The Alaska Board of Game is scheduled to meet February 29-March 10, 2008, to deliberate on proposals concerning changes to regulations governing hunting and trapping of wildlife for the Interior Region. We have reviewed the 138 proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our comments are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact Chuck Ardizzone, OSM Wildlife Liaison with any questions you may have concerning this material.

Sincerely,

Laurence S. Bubla for

Peter J. Probasco,
Assistant Regional Director

Enclosure

cc: Denby Lloyd, ADF&G
Mike Fleagle, Chair, FSB
Kristy Tibbles, Board Support Section, Fairbanks
Tina Cunning, ADF&G, Anchorage
Terry Haynes, ADF&G, Fairbanks
Interagency Staff Committee
Chuck Ardizzone, OSM

COMMENT# 30

PRELIMINARY RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

February 29-March 10, 2008 Meeting
Fairbanks, Alaska

U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)

Table of Contents

Proposal	Page Number
Proposal #4	1
Proposal #5	1
Proposal #6	2
Proposal #7	2
Proposal #8	2
Proposal #10	2
Proposal #11	3
Proposal #12	3
Proposal #15	3
Proposal #46	4
Proposal #47	4
Proposal #56	4
Proposal #57	4
Proposal #63	4
Proposal #65	5
Proposal #66	5
Proposal #67	5
Proposal #68	6
Proposal #69	6
Proposal #70	7
Proposal #71	7
Proposal #72	7
Proposal #73	8
Proposal #75	8
Proposal #78	9
Proposal #79	9
Proposal #80	9
Proposal #82	9
Proposal #114	10

PROPOSAL #4 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Close the nonresident caribou season as follows: Close the nonresident caribou season in Unit 18, initiate a Tier I hunt and develop a comprehensive and cooperative Mulchatna Caribou Herd rebuilding plan.

Current Federal Regulation:

Caribou		
Unit 18	*3 caribou; however, no more than 1 caribou may be taken from Aug. 1-Nov. 30*	*Aug. 1-Mar. 15*

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

Federal Position /Recommended Actions: The OSM recommendation is to **support** the elimination of the nonresident caribou season in Unit 18. OSM **supports** the establishment of a cooperative recovery plan for the Mulchatna Caribou Herd.

Rationale: Because it is generally recognized that nonresident hunters primarily target large bulls from the herd which currently has a low bull:cow ratio, elimination of the nonresident caribou seasons within the Mulchatna Caribou Herd's range is important for the conservation and continued benefit of this resource. A delay in the requested regulatory action could be detrimental to the Mulchatna Caribou Herd and the availability of Mulchatna caribou for subsistence users. Retention of the large bull caribou, which are generally targeted by nonresident hunters, should help to facilitate herd growth.

Rural residents who use Mulchatna caribou and resource managers are concerned about the declining caribou population. The ADF&G has documented a 62% decline in caribou harvest that occurred between 1999 and 2004. The reported harvest during the 2005-06 season for resident and nonresident hunters totaled 1,991 caribou. Current harvest data for the 2006-07 regulatory year indicate that harvest remains at about this level. Rural Alaskan residents must compete with other user groups during this period of substantive decline in Mulchatna caribou.

At its May 2007 meeting, the Federal Subsistence Board reduced the harvest limit for the Mulchatna herd on Federal public lands from five caribou to three caribou, changed the fall harvest limit to either bulls or cows to reduce the bull harvest, and allowed no more than one caribou to be harvested prior to Nov. 30. Public comments and testimony from Federal Subsistence Regional Advisory Councils and representatives of resource users supported the harvest reductions as well as a closure of the nonresident season. The OSM supports the establishment of a cooperative recovery plan for the Mulchatna Caribou Herd and encourage involvement of affected stakeholders in the process.

PROPOSAL #5 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Close the nonresident caribou hunting season. The Board of Game is requested to eliminate the nonresident hunting season that provides for the taking of caribou in Unit 18 until the Mulchatna Caribou Herd rebounds.

Current Federal Regulation:

Caribou		
Unit 18	*3 caribou; however, no more than 1 caribou may be taken from Aug. 1-Nov. 30*	*Aug. 1-Mar. 15*

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

Federal Position /Recommended Action: The OSM recommendation is to **support** the elimination of the nonresident caribou season in Unit 18.

Rationale: Refer to OSM comments for Proposal 4 above.

PROPOSAL #6 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Modify the caribou hunting season as follows: Provide two caribou seasons in Unit 18: Aug. 1-Oct. 15 and Feb.1-Mar.15.

Current Federal Regulation:

Caribou		
Unit 18	*3 caribou; however, no more than 1 caribou may be taken from Aug. 1-Nov. 30*	*Aug. 1-Mar. 15*

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

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

Rationale: Adoption of the proposed regulatory change would reduce opportunity for local residents, when lower Kuskokwim residents harvest these caribou by snowmachine. Although the Mulchatna Caribou Herd occupies its winter range in Unit 18 during this time period, the harvest limits imposed by the Federal Subsistence Board are thought to be sustainable.

PROPOSAL #7 – 5 AAC 99.025. Customary and traditional uses of game populations. Revise the Amount Necessary for Subsistence for moose in Unit 18. The Alaska Board of Game is requested to work with the Department toward revising the existing Unit 18 Amount Necessary for Subsistence (ANS) for moose that is based upon the amounts needed for all the communities in Unit 18.

Current Federal Regulation: *Federal regulations do not include ANS findings.*

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

Federal Position /Recommended Action: The OSM recommendation is to **support** the proposal.

Rationale: Attaining and using accurate harvest numbers for defining ANS contributes to sound conservation and management, which is of benefit to Federally qualified subsistence users and others. OSM supports attaining and using accurate harvest data so that the Board can incorporate them into the ANS findings and reflect actual harvests.

PROPOSAL # 8- 5 AAC 84.270. Furbearer trapping and **92.085(6). Unlawful methods of taking big game, exceptions; and 92.990(21), definitions.** Establish a trapping season for black bear in Unit 19 as follows: Three black bears may be taken every season; no more than two may be taken by trapping Apr.1-May 31 in Units 19.

Current Federal Regulation: *There is no Federal trapping season for black bear in Unit 19. You may not take a bear cub, or sow accompanied by cub(s).* You may not take bears for subsistence purpose with a snares or traps.

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

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

Rationale: Adoption of the proposal would result in the take of cubs, sow black bears accompanied by cubs, and the incidental harvest of a wide variety of other species. We do not believe that this practice is consistent with sound wildlife management principles. Trapping black bear is not a customary and traditional practice. Current State and Federal regulations allow the harvest of 3 black bear per regulatory year, with a year round season; there is little evidence to suggest that this is not sufficient for subsistence.

PROPOSAL #10 - 5 AAC 85.045. Seasons and bag limits for moose. Amend the regulations for the Holitna River: Upstream of Titnuk Creek including Titauk Creek, Hoholitna River: Upstream of Little Diamond Mountain: one bull with spike fork, or 50 inch, or 4 or more brow tines on each side.

Current Federal Regulation: There is *no Federal open season* for moose in this portion of Unit 19.

Is a similar issue being addressed by the Federal Subsistence Board? A proposal (WP08-35) is currently being reviewed that requests a season for the Holitna River upstream and including Titnuk Creek and Hoholitna River upstream from Little Diamond Mountain- 1 bull limit with spike-fork or 50-inch antlers, or antlers with 4 or more brow tines on one side.
Federal Position /Recommended Action: The OSM recommendation is to **oppose** the proposal.
Rationale: Adoption of Proposal #10 could eventually prove detrimental to the moose population in this portion of Unit 19. Surveys conducted in Unit 19A, north of the Kuskokwim River in 2007 and south of the Kuskokwim River in 2005, indicated that the moose population remains in critical status. The affected area should remain closed to moose hunting until the population can sustain a limited hunter harvest.

PROPOSAL #11 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Amend the regulations for Unit 19 caribou to eliminate the nonresident caribou hunting season that provides for the taking of caribou in Units 19A and 19B.
Current Federal Regulation:

Caribou		
Unit 19A north of the Kuskokwim River	*1 caribou*	*Aug. 10-Sept. 30 and Nov. 1-Feb. 28*
Unit 19A south of the Kuskokwim River and 19B (excluding Lime Village)	*3 caribou; however, no more than 1 caribou may be taken from Aug. 1-Nov. 30*	*Aug. 1-Apr. 15*

Is a similar issue being addressed by the Federal Subsistence Board? No.
Federal Position /Recommended Action: The OSM recommendation is to **support** the elimination of the nonresident caribou season in Unit 19A and 19B.
Rationale: Refer to OSM comments for Proposals #4 above.

PROPOSAL #12 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Modify the season dates and antler restriction for moose in Unit 19B to allow subsistence hunters to take any antlered bull Aug. 25-Sept. 25.
Current Federal Regulation:

Moose		
Unit 19B	*1 bull with spike-fork or 50-inch antlers, or antlers with 4 or more brow tines on one side*	*Sept. 1-Sept. 20*

Is a similar issue being addressed by the Federal Subsistence Board? No.
Federal Position /Recommended Action: The OSM recommendation is to **oppose** the proposal.
Rationale: This would add ten days and allow an "any bull" hunt. This additional opportunity would not be consistent with sound management of this population.

PROPOSAL #15 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish a winter moose season in Unit 19D, that portion between and including the Cheeneetnuk and Gagaryah River drainages excluding that portion within two miles of the Swift River.
Current Federal Regulation:

Moose		
Unit 19D remainder	*1 antlered bull*	*Sept. 1-Sept. 30 and Dec. 1-Dec. 15*

Is a similar issue being addressed by the Federal Subsistence Board? No.
Federal Position /Recommended Action: The OSM recommendation is to **oppose** the proposal.
Rationale: This proposal would allow an "any bull" season for the full month of December. This additional opportunity would not be consistent with sound management of this population.

PROPOSAL #46 – 5AAC 85.020 Hunting seasons and bag limits for brown bear. Allow 2 brown bear every regulatory year in Units 21A and 21D.

Current Federal Regulations:

Brown Bear

Unit 21D	*1 bear by State registration permit only*	*Aug. 10-June 30*
Unit 21 remainder	*1 bear*	*Aug. 10-June 30*

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

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

Rationale: U. S. Fish and Wildlife Service (FWS) Refuge staff noted that there are no data to support the proponent's claim that this brown bear population is at an all time high, nor is there any data to show that the moose population in this area is declining.

~~~~~~

PROPOSAL #47 – 5AAC 85.045. Hunting seasons and bag limits for moose. Shorten the resident and nonresident moose seasons in Unit 21A by five days and add antler restrictions for residents.

Current Federal Regulations:

Moose

Unit 21A	*1 bull*	*Aug. 20-Sept. 25 and Nov. 1-Nov. 30*

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

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

Rationale: FWS Refuge staff noted that there are no data to support the proponent's claim that the moose population, age structure, and calf production are in decline. This proposal would unnecessarily restrict local hunters.

~~~~~~

PROPOSAL #56 – 5AAC 85.015. Hunting seasons and bag limits for black bear. Increase the bag limit for black bear in Unit 21A and 21E to 5 bears/year.

Current Federal Regulations:

Black Bear

Unit 21	*3 bear*	*July 1-June 30*

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

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

Rationale: Existing household survey data indicates that the harvest of black bear is well below the proposed limit and there is no evidence presented to support increasing the harvest limit as requested.

~~~~~~

PROPOSAL #57 – 5AAC 85.045. Hunting seasons and bag limits for moose. Establish a drawing permit hunt in Unit 21A.

Current Federal Regulations:

Moose

Unit 21A	*1 bull*	*Aug. 20-Sept. 25 and Nov. 1-Nov. 30*

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

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

Rationale: FWS Refuge staff noted that there are no biological data to support the proponent's claim that the moose population and age structure are in decline. Data suggests that the moose population in the proposed drawing permit area is capable of supporting a harvest of more than would likely result from the requested 20 drawing permits/year. This proposal is an unnecessary restriction to local hunters.

~~~~~~

PROPOSAL #63 – 5AAC 85.045. Hunting seasons and bag limits for moose. Modify the Unit 24C and 24D moose hunting season from Aug. 27-Sept. 20 to Sept. 1-Sept. 27.

Current Federal Regulations:

Moose		
Unit 24C and 24D, that portion within the Koyukuk Controlled Use Area and the Koyukuk NWR	*1 moose; however, antlerless moose may be taken only during Aug. 27-31 and the Mar. 1-5 season, if authorized by announcement by the Koyukuk/Nowitna NWR Manager and the BLM Central Yukon Field Office Manager. Harvest of cow moose accompanied by calves is prohibited. During the Aug. 27-Sept. 20 season, a State registration permit is required. During the Mar. 1-5 season, a Federal registration permit is required. Announcement for the antlerless moose season and the cow quotas will be made after consultation with the ADF&G Area Biologist and the Chairs of the Western Interior Alaska Subsistence Regional Advisory Council, and the Middle Yukon and Koyukuk River Fish and Game Advisory Committees.*	*Aug 27-Sept 20 Mar. 1-5 (to be announced)*

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

Federal Position/Recommended Action: The OSM recommendation is to **support the proposal with modification** to a Sept. 1-Sept. 25 season for one bull.

Rationale: Koyukuk/Nowitna NWR recommends adoption with the amended season dates of Sept. 1–Sept. 25 for one bull. This would align the drawing permit hunt closure date with the Federal season closure date. There are no biological concerns for the population. Based on results from moose population surveys conducted since 2001 by NWR staff on two Trend Count Areas within Unit 24D, the adult population remains stable, recruitment is good, and production is good. The number of cows has remained stable, averaging 895 and staying within a range of just ±30 cows annually. Bull counts have remained close to the average of 287 and this year's bull:cow ratio is at the average with 33 bulls:100 cows. Calf production and recruitment have been consistently good since 2002.

~~~~~~

PROPOSAL #65 – 5AAC 85.045. Hunting seasons and bag limits for moose. Modify the bag limit and antler restriction for moose in 24D to shift the one bull season to Sept. 1-Sept. 20 and establish a spike/fork season from Sept. 20-Sept. 30.

Federal Position/Recommended Action: The OSM recommendation is to **support the proposal with modification** to a Sept. 1-Sept. 25 season for one bull.

Rationale: See comments on Proposal #63 above.

~~~~~~

PROPOSAL #66 – 5AAC 85.045. Hunting seasons and bag limits for moose. Modify the season date for moose in 24D to Sept. 1-30 for "any bull".

Federal Position/Recommended Action: The OSM recommendation is to **support the proposal with modification** to a Sept. 1-Sept. 25 season for one bull.

Rationale: See comments on Proposal #63 above.

~~~~~~

PROPOSAL #67 – 5AAC 85.045. Hunting seasons and bag limits for moose. Modify the bag limit and antler restriction for moose in Unit 24D. Allow an antlerless moose permit hunt in Unit 24D. Prohibit the taking of calves or cows accompanied by calves.

Current Federal Regulations:

Moose		
Unit 24C and 24D, that portion within the Koyukuk Controlled	*1 moose; however, antlerless moose may be taken only during Aug. 27-31 and the Mar. 1-5 season, if authorized by announcement by the Koyukuk/Nowitna NWR Manager and the BLM Central Yukon Field Office Manager. Harvest of cow moose accompanied by calves is prohibited. During the Aug. 27-*	*Aug 27-Sept 20 Mar. 1-5 (to be announced)*
~~~~~~

Use Area and the Koyukuk NWR	*Sept. 20 season, a State registration permit is required. During the Mar. 1-5 season, a Federal registration permit is required. Announcement for the antlerless moose season and the cow quotas will be made after consultation with the ADF&G Area Biologist and the Chairs of the Western Interior Alaska Subsistence Regional Advisory Council, and the Middle Yukon and Koyukuk River Fish and Game Advisory Committees.*

Is a similar issue being addressed by the Federal Subsistence Board? No.
Federal Position/Recommended Action: The OSM recommendation is to **oppose** the proposal.
Rationale: Koyukuk/Nowitna NWR staff conducted Moose Trend Counts in November of 2007 and found that the population is stable. Within Unit 24D, cow numbers have remained stable, averaging 895 and staying within range of ±30 annually since 2001. A conservative harvest approach should be taken with this moose population. The opportunity to harvest a moose, if the hunter was not successful during the regular season, continues to exist. During the Mar. 2005 hunt, a quota of 10 moose was given, 5 in 2006 and 10 in 2007. Total moose harvested was 10, 4, and 6 during 2005, 2006, and 2007 respectively.

~~~~~~

PROPOSAL #68 – 5AAC 92.260. Taking cub bears and female bears with cubs prohibited and 92.085. Unlawful methods of taking big game, exceptions. Modify the bag limit and the methods for taking black bear to allow traditional predator management methods in Unit 25D.
Current Federal Regulations:
You may not take a bear cub, or sow accompanied by cub(s).
Black Bear

Unit 25D	*3 bear or 3 bear by State community harvest permit*	*July 1-June 30*

Is a similar issue being addressed by the Federal Subsistence Board? No.
Federal Position/Recommended Action: The OSM recommendation is to **oppose** the proposal.
Rationale: No information is presented to support the proposed request, nor is information presented in support of the proponent's assertion that bear populations (black and grizzly) are increasing. Current black bear regulations are very liberal and harvest survey data reflects an increasing harvest in the last five years primarily in response to the Yukon Flats Cooperative Moose Management Plan. While taking black bears from the den has been practiced by residents of villages on the middle and upper Yukon, taking sows and cubs from a den is not legal. More evidence should be provided for why this proposal should be supported.

~~~~~~

PROPOSAL #69 – 5AAC 92.045. Hunting seasons and bag limits for moose. Clarify boundary for the 25D West Tier II moose hunt.
Current Federal Regulations:
Moose

Unit 25D west, that portion lying west of a line extending from Unit 25D boundary on Preacher Creek; then downstream along Preacher Creek, Birch Creek and the lower mouth of Birch Creek to the Yukon River; then downstream along the north bank of the Yukon River (including islands) to the confluence of Hadweenzic River; then upstream along the west bank of Hadweenzic River to the confluence of Forty and One-Half Mile Creek; and then upstream along Forty and One-Half Mile Creek to Nelson Mountain on the Unit 25D boundary. [Permits will be available in the following villages: Beaver (25 permits), Birch Creek (10 permits), and Stevens Village (25 permits). For residents of 25D west who do not live in one of the three villages, permits will be available by contacting the Yukon Flats NWR office in Fairbanks or a local RIT. Moose hunting on Federal public lands in Unit 25D west is closed at all times except for residents of Unit 25D west hunting under these regulations. The moose season will be closed by the NWR Manager when 60	*1 bull by Federal registration permit*	*Aug. 25-Feb. 28*

moose have been harvested in the entirety (from Federal public lands and non-Federal public lands) of Unit 25D west.]

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

Federal Position/Recommended Action: The OSM recommendation is to **support** the proposal.

Rationale: This proposal clarifies the boundary for the State Tier II hunt and the Federal permit hunt.

PROPOSAL #70 – 5AAC 85.055. Hunting seasons and bag limits for Dall sheep. Establish a drawing permit hunt in Unit 25A

Current Federal Regulations:

Sheep

Unit 25A- Arctic Village Sheep Management Area- [Federal public lands, except the drainages of Red Sheep Creek and Cane Creek during the period of Aug. 10-Sept. 30, are closed to the taking of sheep except by rural Alaska residents and the Arctic Village, Venetie, Fort Yukon, Kaktovik and Chalkyitsik hunting under these regulations.]	*2 rams by Federal registration permit only*	*Aug. 10-Apr. 30*

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

Federal Position/Recommended Action: The OSM recommendation is to **support** the proposal.

Rationale: Arctic NWR supports development of a specific harvest goal for this management area and the implementation of a drawing permit hunt. A drawing permit hunt would allow ADF&G to more closely manage the harvest, and provide the public with accurate hunter numbers and hunt locations within this Federal-designated sheep management area. Arctic NWR staff conducted aerial surveys of Dall sheep in a 150 mi^2 area of potential sheep habitat adjacent to Red Sheep Creek with the Arctic Village Sheep Management Area (AVSMA) during 20-22 June 2007. They observed 92 sheep in 29 groups, including 62 adult ewes/yearlings/2-year olds, 16 lambs, and 14 rams. Sheep density, corrected to visibility, was estimated at 0.81 sheep/mi^2. This is much lower than estimated from previous surveys in 2006, 1991, and 1990. However, their survey effort was restricted to a small portion of the AVSMA, and the results may reflect differences in sheep distribution rather than changes in population density.

PROPOSAL #71 – 5AAC 85.020(24). Hunting seasons and bag limits for brown bear. Open the brown bear season in Unit 26B one week earlier.

Current Federal Regulations:

Brown Bear

Unit 26B	*1 bear*	*Sept. 1-May 31*

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

Federal Position/Recommended Action: The OSM recommendation is to **support** the proposal.

Rationale: Opening the brown bear season one week earlier would provide additional opportunity and will likely not have a significant biological effect on the population.

PROPOSAL #72 – 5AAC 85.020. Hunting seasons and bag limits for brown bear. Modify the brown bear season dates and permits in Unit 26

Current Federal Regulations:

Brown Bear

Unit 26A	*1 bear by State registration permit only*	*July 1-May 31*
Unit 26B	*1 bear*	*Sept. 1-May 31*
Unit 26C	*1 bear*	*Aug. 10-June 30*

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

Federal Position/Recommended Action: The OSM recommendation is to **oppose** the proposal. **Rationale**: Extensions of seasons in Unit 26B in spring and fall, and substantial increases to the number of permits, may result in an unsustainable harvest of brown bears in Unit 26B. Brown bears in arctic Alaska are living at the northern edge of their range. Low densities and slow reproductive rates make these northern bear populations vulnerable to over-harvest. The changes suggested in this proposal are not consistent with sound management of this population.

PROPOSAL #73 -5 AAC 85.045. Hunting seasons and bag limits for moose. Open the moose season in 26C Sept. 5-Apr. 15 (one bull by registration permit) for residents and Sept. 5-Nov. 30 (50-in. or 4 brow tines by registration permit) for nonresidents.

Current Federal Regulations:

Moose		
Unit 26B remainder and 26C	*1 moose by Federal registration permit by residents of Kaktovik only. The harvest quota is 3 moose (2 bulls and 1 of either sex) provided that no more than 2 bulls may be harvested from Unit 26C and cows may not be harvested from 26C. You may not take a cow accompanied by a calf. Only 3 Federal registration permits will be issued. Federal public lands are closed to the taking of moose except by Kaktovik residents holding a Federal registration permit, hunting under these regulations.*	*July 1-Mar. 31*

Is a similar issue being addressed by the Federal Subsistence Board? A proposal to the Federal Subsistence Board proposal (WP08-54) concerning Unit 26B remainder and 26C moose is currently being reviewed.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** the proposal. **Rationale**: While moose populations in 26A and 26B have shown increases over the past several years, the moose population in 26C has remained low and stable. Surveys from the Canning River to the Canadian border documented 52, 47 and 59 moose in 2003, 2005 and 2007 respectively. Arctic NWR estimates the actual population to be between 60 and 70 moose. No browse surveys have been done by any agency in Unit 26C. The rationalization of decreasing the population to avoid starvation is not justified. The upper Kongakut and Firth-Mancha drainages have a migratory moose population that travels into Canada starting in mid-March and returns to the Arctic NWR starting in late September. A study of these populations indicated over 80% of the animals migrate seasonally and would not be available for hunters in either of these drainages. Surveys in late October of 1991, 2000, and 2002 documented 163, 70 and 95 moose in the Upper Kongakut and 245, 88 and 132 moose in the Firth-Mancha area. With so few animals available for harvest in the Upper Kongakut and Firth-Mancha areas, and with so few resident animals available in the remaining area of 26C where trends are not increasing and subsistence hunting is being limited, there is no biological justification for supporting this proposal .

PROPOSAL #75 – 5 AAC 84.270. Furbearer trapping; 92.085(6). Unlawful methods of taking game, exceptions; and 92.990 Definitions (21). Allow black bear trapping in Units 21 and 24 using snares or foot hold traps.

Current Federal Regulation: *There is no Federal trapping season for black bear in Units 21 and 24. You may not take a bear cub, or sow accompanied by cub(s).* You may not take bears for subsistence purpose with a snares or traps.

Federal Position /Recommended Action: The OSM recommendation is to **oppose** the proposal. **Rationale:** See comments for Proposal #8 above.

PROPOSAL #78 -5 AAC 92.085. Unlawful methods of taking big game, exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited. Allow the taking of black bear from dens in Unit 21B, 21C, 21D, and 24.
Current Federal Regulations: *You may not take a bear cub, or sow accompanied by cub(s).*
Federal Position/Recommended Action: The OSM recommendation is to **oppose** the proposal.
Rationale: Adoption of the proposal would result in the take of cubs, and sow black bears accompanied by cubs. We do not believe that this practice is consistent with sound wildlife management principles.

PROPOSAL #79 -5 AAC 92.085. Unlawful methods of taking big game, exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited. Allow the taking of black bear from dens in Unit 21, and 24 and allow use of artificial light to take bears in the den in Units 21B, 21C, 21D, and 24.
Current Federal Regulations: *You may not take a bear cub, or sow accompanied by cub(s).* You may not take bears with an *artificial light.*
Federal Position/Recommended Action: The OSM recommendation is to **oppose** the proposal.
Rationale: See comments on Proposal #78 above.

PROPOSAL #80 – 5AAC 85.045. Hunting seasons and bag limits for moose. Extend the moose season dates in the Koyukuk Controlled Use Area from Aug. 27-Sept 20 to Aug. 27-Sept. 25.
Federal Position/Recommended Action: The OSM recommendation is to **support the proposal with modification** to a Sept. 1-Sept. 25 season for one bull.
Rationale: See comments on Proposal #79 above.

PROPOSAL # 82- 5 AAC 84.270(1). Furbearer trapping. 5 AAC 85.060(a)(6). Hunting seasons and bag limits for fur animals, and **5 AAC 92.095(a)(3) Unlawful methods of taking furbearers; exceptions.** Liberalize and simplify beaver seasons, bag limits and harvest methods throughout Region III.
Current Federal Regulation:

Beaver (trapping)		
Unit 20A, 20B, 20C, 20F	*No limit*	*Nov. 1-Apr. 15*
Unit 20E	*25 beaver per season. Only firearms may be used during the Sept. 20-Oct. 31 and Apr. 16-May 15, to take up to 6 beaver. Only traps or snares may be used Nov. 1-Apr. 15. The total annual harvest limit for beaver is 25, of which no more than 6 may be taken by firearm under trapping or hunting regulations. Meat from beaver harvested by firearm must be salvaged for human consumption.*	*Sept. 20-May 15*
Unit 12	*15 beaver per season. Only firearms may be used during the Sept. 20-Oct. 31 and Apr. 16-May 15, to take up to 6 beaver. Only traps or snares may be used Nov. 1-Apr. 15. The total annual harvest limit for beaver is 15, of which no more than 6 may be taken by firearm under trapping or hunting regulations. Meat from beaver harvested by firearm must be salvaged for human consumption.*	*Sept. 20-May 15*
Unit 19, 21, and 24	*No limit*	*Nov. 1-June 10*
Unit 25C	*No limit*	*Nov. 1-*

Unit 25 remainder	*50 beaver*	*Apr. 15 Nov. 1- Apr. 15*

Is a similar issue being addressed by the Federal Subsistence Board? No
Federal Position /Recommended Action: The OSM recommendation is to **support** the proposal.
Rationale: The proposal provides additional opportunity, and is sustainable given the beaver populations in the Interior are abundant.

PROPOSAL # 114- 5 AAC 85.045. Hunting seasons and bag limits for moose. Reauthorize the existing antlerless moose season in Berners Bay.

Current Federal Regulation:

Moose

Unit 1C Berners Bay drainages	*No Federal open season*

Is a similar issue being addressed by the Federal Subsistence Board? A proposal to the Federal Subsistence Board (WP08-06) to establish a Customary and Traditional Use Determination and hunting season for Berners Bay moose is currently being reviewed.

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE COMMISSIONER

SARAH PALIN, GOVERNOR

☐ P.O. BOX 111000
JUNEAU, ALASKA 99811-1000
PHONE: (907) 465-2400
FAX: (907) 465-3886

☐ 550 WEST 7TH AVENUE, SUITE 1400
ANCHORAGE, ALASKA 99501-3650
PHONE: (907) 269-8431
FAX: (907) 269-8918

January 11, 2008

Cliff Judkins, Chairman
Alaska Board of Game
Alaska Department of Fish and Game
P.O. Box115526
Juneau, Alaska 99811-5526

Dear Mr. Judkins,

I am responding to your letter of October 30, 2007, that expressed concern over potential mining activities in the Denali Block. I am aware that the Board, in its spring 2007 deliberations, considered a public proposal to create a wildlife refuge within this Block but did not take action on this proposal. The Board did, however, wish to underscore the importance of sound land management by Department of Natural Resources (DNR) within this Block.

As described in DNR's letter to the Board on February 16, 2007, a copy of which is attached and re-submitted to the Board, the Department is aware of the habitat importance of this area for the Nelchina Caribou Herd and considers this when making land management decisions in this area. The Tanana Basin Area Plan (TBAP), which includes much of the area in question, co-designates this area (TBAP, Subunit 5C) as 'Public Recreation' and 'Wildlife Habitat'. DNR is required to manage state land for multiple use consistent with adopted area plans, in this case the TBAP, and only activities that are consistent with these designations or can be made to be consistent through the use of stipulations are allowable within this area.

In addition, under state law all state land is open to mineral entry (staking of mining claims) unless specifically closed by act of the legislature or the Commissioner of Natural Resources. The Commissioner's authority to close areas to mining is specifically limited to areas of 640 acres or less, with certain exceptions for development projects and land disposals. Neither the Tanana Basin Area Plan or Copper River Basin Area Plan proposed any mineral closures in the Tangle Lakes area.

DNR has management authority over both surface and subsurface activities in this block, and we intend to use our authorities to ensure the health of the Nelchina Caribou Herd and its habitat. DNR considers wildlife resources when

COMMENT# 31

authorizing land uses or mining activities and includes stipulations in our authorizations that will ensure this protection.

DNR established the Tangle Lakes Archaeological District Special Use Area specifically so that recreation and mining activities would be subject to higher standards for the protection of archaeological and other resources, including wildlife. This authority affects the types of public uses that can occur on state land, and specifically constrains 'generally allowed uses'. Surface activities requiring authorization by DNR must adhere to the requirements of the area plan, which focuses on the maintenance of wildlife and recreation. DNR can only issue authorizations that are consistent with that intent.

Subsurface activities are affected either by leasehold location order or by mining laws and regulations. The northern part of this area is affected by Leasehold Location Order (LLO) 26. LLO's provide the state more leverage when permitting mining activities on state land. Unlike a mining claim, a LLO must be converted to a lease before mine production is allowed. Mining in the southern part of this area is open to mineral entry and is controlled by existing mining statutes and regulations. DNR has the authority to include stipulations in exploration permits to protect wildlife resources, and it is our intention to apply requirements for wildlife and habitat protection under either the LLO or exploration permits processes. We have been successful in the past at working with companies conducting exploration in the area to be heedful of other users of the land such as by rerouting helicopter paths and maintaining altitudes so as not to disturb wildlife.

I trust that this explanation will reassure the Board of the Department's authorities to impose necessary stipulations and of our intent to do so in order to ensure the continued health of the Nelchina Caribou Herd and its habitat. I appreciate the opportunity to comment on this important issue again.

Sincerely,

Thomas E. Irwin
Commissioner

Cc: Denby Lloyd, Commissioner, Department of Fish and Game
Ken Taylor, Deputy Commissioner, Department of Fish and Game
Mike Nyzich, Deputy Chief of Staff, Office of the Governor
Dick Mylius, Director, DNR Division of Mining, Land and Water
Ed Fogels, Director, DNR Office of Project Management and Permitting

COMMENT# 31

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF MINING, LAND AND WATER

SARAH PALIN, GOVERNOR

DIRECTOR'S OFFICE
550 W. 7th AVE., SUITE 1070
ANCHORAGE, ALASKA 99501-3579

PHONE (907) 269-8600
FAX (907) 269-8904

February 16, 2007

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

RE: Proposal 204 – Wildlife Refuge Proposal

Dear Members of the Board of Game:

The Alaska Department of Natural Resources (DNR) has reviewed Proposal 204, a proposal to recommend that the legislature create a wildlife refuge in the Tangle Lakes area north of the Denali Highway. DNR has three major concerns with the proposal as submitted: first, the proposal is based on incorrect assumptions about DNR's existing authority to consider wildlife concerns in its land management decisions; second the proposal is inconsistent with DNR land use plans for the area and the purposes for which the state acquired this land; and third, the proposal fails to recognize valid existing third party rights that have been created on this state land. I will address each of these points.

1. DNR's existing authorities and management for this area provide protection for wildlife and related public uses. DNR manages all of the state land within the proposed refuge. The state has adopted state land use plans for this area, the Tanana Basin and Copper River Basin Area Plans that recognize the wildlife values, hunting, other recreational uses, and archeological resources. DNR in 2003 established the Tangle Lakes Archaeological District Special Use Area specifically so that recreation and mining activities would be subject to higher standards for protection of archaeological and other resources.

DNR specifically considers wildlife resources when authorizing land uses, including mineral exploration activities. The sponsors argue under "What Will Happen if Nothing is Done" that DNR does not consider wildlife as part of its permitting for exploration. This is not correct; DNR does have the authority and does in fact include stipulations in exploration permits to protect wildlife resources. This authority is under the authority of the DNR Division of Mining, Land and Water under AS 38.05. The sponsors make the statement that DNR Office of Habitat Management and Permitting cannot require stipulations for non-

COMMENT# 31

fisheries resources, which is true, but the sponsors ignore DNR's authorities as land manager.

2. This land was selected by the state for multiple use, including minerals, and DNR's land use plans call for multiple use management of this area. The land within the proposed refuge was acquired by the state specifically because it contains multiple resource values that are appropriate for the state to acquire under the Alaska Statehood Act. This land was selected by the state because of high values of recreation, wildlife, and minerals. The area has a history of mining that dates back to the early 1900s. When making land selections from the federal government, one of the primary considerations is how the state would manage the land that would be different from how it would be managed by the federal Bureau of Land Management (BLM). These particular lands were known to have potential for minerals and the state concluded that these mineral resources were more likely to be explored and developed if the land was under state rather than federal ownership.

DNR's Tanana Basin and Copper River Basin Area Plans specify multiple use management for this land, including allowing for staking of mining claims and mineral exploration and potential development. These plans and the Special Use Area designation referred to above were developed through a very public process that considered all resource values. The Department of Fish and Game was an active participant in both land planning efforts.

3. The proposal ignores valid existing mining claims that exist throughout this area. The proposal states that a purpose for the refuge is to "Disallow Hard Rock Mining". State laws allow individuals and corporations the right to stake mining claims on state land. In fact, AS 38.05.300 specifically limits DNR's authority to close more than 640 acres to mineral entry. Much of the proposed refuge has been staked with valid mining claims. Mining companies have expended millions of dollars conducting exploration work on these claims and continue to spend millions of dollars annually with the assumption that they may be able to develop these claims. The right to develop these claims is subject to approval by state and federal agencies through the existing permitting process. To now set aside these lands as a game refuge specifically prohibiting most mining ignores the valid existing rights of mining claim holders and would leave the state vulnerable to takings claims.

One final comment is that under the section "Who is Likely to Suffer", the sponsors list is incomplete, as it only refers to hard rock mining and mineral exploration companies. Mineral exploration activities in the area and related support services (aviation, lodging, etc.) have employed many Alaskans. If a mineral deposit is discovered, it would employee hundreds or more Alaskans with high-paying jobs. Mines also provide royalties and taxes to the state and any

future borough would gain significant tax revenues from any mine. Much of this area is within the proposed Deltana Borough.

In summary, DNR finds that statements made by the sponsors to support this proposal do not correctly reflect DNR's authorities or current management of state land in this area.

Sincerely,

Dick Mylius, Acting Director
Division of Mining, Land and Water

cc: Tom Irwin, Commissioner, DNR
Denby Lloyd, Commissioner, Department of Fish and Game
Joe Balash, Special Assistant, Office of the Governor
Kerry Howard, Director, DNR, Office of Habitat Management and Permitting
Tom Crafford, DNR Large Mine Projects Coordinator

COMMENT# 31

I am writing to say that I strongly do not support proposal # 38. All my life I have lived in Alaska and grown up in unit 20A. For 15 years I have hunted here and harvested game for myself and family. I have personally been harassed by airplanes buzzing game that I am in persute of. To make the use of motorized vehicles illegal in this area would be a detriment to many hunters and would also put many hunters on and near my property which borders this area. I again state my opposition.

Sincerely, John Greenleaf

I AM OPPOSED TO PROPOSAL 38. I HAVE LIVED AND HUNTED IN THIS AREA SINCE 1989. RESTRICTING THE USE OF ATV'S IN THE PROPOSED AREA WILL GREATLY INCREASE THE PRESSURE IN THE ALREADY OVERHUNTED AREA OF RAINBOW LAKE.

ATV HUNTERS RELY ON THE USE OF ESTABLISHED TRAILS TO ACCESS HUNTING AREAS. THIS AREA HAS ESTABLISHED TRAILS, SO IT'S STATUS SHOULD REMAIN AS IS.

THIS PROPOSAL SEEMS TO BE GEARED TOWARDS PROTECTING THE INTERESTS OF A GROUP OF HUNTERS THAT FLY IN TO THE MOLY RIDGE / MT. HAYES AREA. IT IS THE JOB OF THE BOARD OF GAME TO LOOK AT THE RESOURCE AS A WHOLE AND THE NEEDS OF THE LONG TIME RESIDENTS OF THE AREA. IF THIS AREA IS CLOSED TO ATV TRAFFIC IT SHOULD ALSO BE CLOSED TO AIR TRAFFIC.

I AM OPPOSED TO PROPOSAL 38.

NATHAN MILLER
(LONG TIME ZOA RESIDENT)

COMMENT# 33

February 15, 2008

To Whom it may Concern,

I am opposed to proposal 38.

I have been hunting in this area for 16 years and have a vested interest in the game regulations that affect this area. There are many established trails in this area in which I use ATV's to access. I believe by restricting ATV use in the area proposed this would greatly increase the hunting pressure in the Rainbow Lake hunting area. The Rainbow Lake area is already over hunted and the amount of game has been decreasing in that area due to the recent cow hunts.

I do think that we should promote safe hunting practices and protect the environment but this area is used extensively by the military with much heavier vehicles than ATV's and I can not see how ATV's running on the existing trails could damage the environment.

This area has been a great place to teach my 4 kids safe hunting practices and environmental care. I would hate to see this area lost because a small group of pilots are looking to corner a specific hunting area. We should all work together to make sure all of unit 20A is available for all hunters with ATV's. I do own property in Unit 20A also, so I have a vested interest in what happens to this area for hunting and otherwise.

One last point. According to Don Young Unit 20A is overpopulated with moose. There have been many cow hunts in the last few years to thin down the herd. By limiting an area such as this it will only make things worse because less hunters will be able to access this area leading to increasing population of moose.

I am opposed to proposal 38

Thank you for your time and consideration

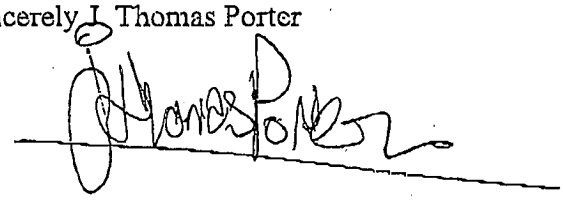
Joshua A. Lawhorne

COMMENT# 34

To Board of Game.

I am opposed to proposal 38. I Am a long time resident in 20A and have hunted the area for over 15 years. I am also a careful and experienced ATV rider and use my small quad to hunt. If the concern in this petition is about the damage ATV's do in unit 20A I feel ATV's should be restricted in the spring and early summer when the conditions are the wettest and ATV's do the most damage. Not only do I rely on the game I harvest in 20A but I feel 95% of the damage done by ATV's in unit 20A is done in early spring when the area is wet and often flooded. I know the area closest to the Delta and Tanana River is already grossly over hunted, in part because of the cow permit hunts. I know that if 20A was further restricted it would only increase the problem in the closer areas with over hunting. As I see it the only benefit in restricting the use of motor vehicles in unit 20A would be to fly-in hunters, and it would hurt hundreds of hunters who carefully use ATV's in the area to harvest meat for their families. I am strongly opposed to proposal 38.

Sincerely, J. Thomas Porter



COMMENT# 35

I, Peter Rotondi, am in opposition to proposal 38.

I have been hunting in Unit 20A for the last couple years. A close on "all terrain" vehicles will not eliminate game & hunter harassment or quality hunting experiences. If anything is causing this it is the use of airplanes. I have witnessed planes buzzing big game as well as big game hunters and that in itself is more of a harassment not to mention that it's totally illegal.

COMMENT# 36

I am writing in protest to proposal 38. I am not in favor of pilots being able to fly in + utilize this area at the exclusion of property owners in this unit that depend on this area for hunting and have hunted here for over 25 years. As a property owner + resident of this area, it is unjustified to limit the hunting in this area to aircraft fly-ins only + not motorized vehicles.

Jack Frederick

Jack Frederick

COMMENT# 37

I am in opposition to proposal 38. I am a resident in this area + strongly oppose the restriction of motorized vehicles + the exclusive use of aircraft for hunting purposes. I have hunted in this area for over 25 years + depend on the area as a property owner in this unit. Pilots who have consistently utilized this area in the past have not always abided by hunting regulations, have buzzed hunters + animals, etc. At no time have I seen hunters on ATVS or 4 Wheelers posing a threat to hunters, wildlife, etc. Please strongly consider rejecting this proposal.

Thank You,
Vickie Greenleaf
Vickie Greenleaf

COMMENT# 38

I am writting in opposition to proposal 38.
In all my years of hunting in Alaska and particularly this specific game unit in 20A, I've never seen or heard of game or hunter harassment by ATV's, but it commonly happened to me by airplanes. I also believe that low flying airplanes of hunter support or scouting are the most visable and unsight of any motorized vehicle. I believe that isolating this part of a unit will only over load the remainder of the unit with hunting pressure and produce low quality hunting experience.

Ron Greenleaf

Ron Greenleaf

COMMENT# 39

Proposal 38 — 5 AAC 92.540

Opposed

ATV's are the primary means, and in many cases the only practical means, hunters can access most of the hunting lands in Alaska. They are essentially the replacement for pack animals used in times past such as horse and mule. Few hunters have the ability or wherewithal to maintain a stock of pack animals for a few days of hunting big game each year. Creating the proposed controlled use area would essentially prohibit the majority of the hunting residents of Alaska from hunting this area. This is contrary to the purpose of the Board of Game, which is to ensure access to game for as many residents as possible. While I believe the concerns of the proponents are legitimate in their minds, they have failed to consider the impact on the vast majority of those who hunt this area. A restriction to ATV's would limit big game hunting to an elistist group of hunters with sufficient funds to operate aircraft for access. In effect making this public hunting area a sort of private reserve. Further their concerns were not validated with facts and studies, and therefore may very well be overstated. In addition, if upon actual study of the concerns, if merit is found, it seems less drastic measures should be considered first.

ISSUE: *Destruction of habitat.* It is understood that an ATV leaves some trail, since the use of ATV is an acceptable use for back country access, no reason in itself to restrict usage. Proponents have implied widescale permanent destruction of habitat, but supplied no supporting documentation. It seems such a fact would be easy to document, and if found to be outside acceptable guidelines, some sort of system to reduce impact instituted. Perhaps a permit system, similar to the Nat. Park System of allocating limited number of backcountry hiking permits in popular areas.... instead of outright banning of access.

Deterioration of hunting experience, hunter harrassment, unsportsmanlike conduct. These allegations have nothing to do with ATV's themselves, and could easily be experienced regardless of how an individual arrived in the area. People can and do harass each other, and have done so long before ATV's were invented. Using the banning of ATV's as a means to reduce hunter numbers, and thereby reduce incidents of unpleasantness, is an inappropriate way to enforce game laws, penalizing the vast majority of courteous, conciencious hunters who use their ATV's to reach their base camps, and pack out the meat. Again, if excessive numbers of hunters are using this area, the solution is a permit system which limits numbers.

Many states restrict ATV's. "Restricting" anything is obviously a tool of management since time began. That other states restrict ATV's is not particulary noteworthy, or relevant to this proposal. Each circumstance is different, a variety of tools can be applied. As far as other states, most of them have extensive systems of back country fire roads, which enable hunters to get reasonably near a hunting area with conventional trucks, and thereby reduce the need to depend on ATV's. Alaska is pretty much wildnerness, with very little such access....therefore a much greater dependence on ATV's.

What will happen if nothing is done? The concern over greater numbers, and possible enviromental degradation is worthy of study, but not worthy of sudden imposition of severe restriction. As for increased competition between hunters, that would be a function of available game, and given the record numbers of moose this year, that hardly seems a problem. Further, reducing drastically the numbers of hunters could result in an over-population of moose, thereby putting pressure on the enviroment and the game, the opposite result from what the proponents fear.

Will the quality.... be improved? The proponents suggest it will. True, essentially closing an area to public use will have a back to nature effect, and probably be more enjoyable for a few elite hunters... however, that is not the objective of the Game Board. The Board is managing designated resources, for the greatest good, within acceptable "experiential" and game control

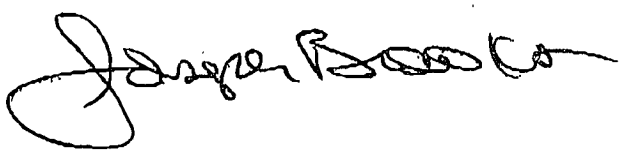
Joseph Bruster pg 1 of 2

COMMENT#40

guidelines. In the absence of hard data, it is difficult to see where such drastic action, as proposed, is justified at this time. Further, there are many who hunt this area who do not agree with the anecotal justifications the proponents offered to support their proposal. Their hunting experience was enjoyable, without the harassment and unplesant experiences cited, and plentiful game taken. Though this is one small watershed, those who live in the area, hunt here...as they should. This proposal would deny them them access to, or at least seriously impact, the fundamental right of putting food on their own table. That seems a bit unreasonable, and in fact many folks in the area do depend to some extent on hunting as an important part of their yearly food needs.

Conclusion: Should the Board see any concerns at this time raised by this proposal, it seems the next step would be to establish a study group, allocate necessary funds to properly investigate the matter, and then ask for public input on as many ways as possible to address real problems. If funding is a problem, a modest fee increase for this area would cover a study (and perhaps reduce somewhat as some would choose to hunt elsewhere). If a need to reduce impact is reported, then it seems more reasonable some kind of limited (ATV) permit system would be more appropriate, NOT a plan to eliminate part of the necessary gear for a successful hunt by the average Alaskan. This is not the time to act rashly, affecting many needlessly; I hope the Board sees the need to respond cautiously by rejecting this proposal, and instead ask for (or seek themselves) some supporting data first.

Joseph Brooks
HC 60 Box 4445
Delta Junction, AK
99737



Joseph Brooks pg 2 COMMENT# 40

Dear Sirs:

I am writting in opposition to proposal 38

The closing of the proposed area to any motorized vehicles would in my opinion put undo strain on adjaycent areas.

I should not like to post my property lines because of this proposal. I am a resident in this particular area.

Thank you

Mark Selvaggio

Mark Selvaggio

COMMENT# 41

Opposed to Proposal 38

I, James Greenleaf, am opposed to proposal 38. I have lived in and hunted in unit 20A for my entire life. To address a few issues of this proposal it is necessary to note that it has been my experience that **big game have been harassed by airplanes just as much as or more than any other motor vehicle.** (Ie. The "buzzing" of moose for the purposes of chasing them or redirecting them from their path towards another hunter.) **Concerning the postulation that ATVs can be or are used to "herd" moose it suffices to say that this is ludicrous idea** considering that moose can run many places ATV's cannot go. As well, mere logical consideration of such an idea renders it invalid.

Finally, let us consider the primary issue of the proposal: that ATVs may harm or degrade the land. The reality is that restricting the motor vehicle use in the land specified by the proposal will most likely NOT cause hunters who hunted there via this means to do ANY of the following: stop hunting all together, buy planes and fly into their previous hunting location or trudge on foot into their previous hunting spots from the nearest highway. **In truth, it is most probable that they will take their ATVs and hunt somewhere else in Alaska.** So any potential harm that may come to the land or the animals, (in as much as any use of the land by people or hunting of the animals could be argued to have such an effect) would simply be displaced to a different location. If the goal of the proposal is really decreasing the net animal harassment in Alaska and maintaining the overall environment in the state we can see that the proposal clearly does not reach it ends.

It is also necessary to note that the proposal also limits the use of the land it concerns to a smaller number of people who have access to, in specific, planes. Therefore, while upgrading the hunting experience for a few, **it degrades the hunting experience for the many who will be forced to hunt in more populated areas after being displaced by the effect of the proposal. This degrades the net hunting experience in Alaska and is favors the special few over the general populace.** Such a plan is not in accordance with the constitution of this noble state or with democratic ideals in general. It is for these reasons and many more that I stand opposed to proposal 38.

James A Greenleaf

COMMENT# 43

This is a written comment in response to **Proposal 38 --- 5 AAC 92.540 Controlled use areas**

I stand in firm opposition to this proposal to eliminate all terrain vehicles (ATV's) from the area within Unit 20A that is drained by Delta Creek upstream from its junction with the 100 Mile Creek between August 1 and September 30.

I am strongly against this proposal because of at least the following reasons:

1. **It causes hardship for me and my family by limiting where I can hunt and obtain moose meat.** I and my family have hunted the area behind my homestead that includes the area around and into the area that proposal 38 seeks to eliminate all terrain vehicle usage in for 20 years. The elimination of ATV use would greatly increase the difficulty of me finding, harvesting and transporting moose meat back to my house (which is not connected by roads to the above area).

2. **It will cause more hunting pressure directly behind my homestead in Unit 20A.** Many hunters that normally would hunt in the above area proposed to be off limits to ATV use would migrate directly into adjacent hunting grounds which will directly affect the area behind my homestead, causing more hunting pressure and all the problems associated with habitat over use.

3. **It unfairly allows a small minority exclusive access to State Land for private hunting camps.**
This proposal is a thinly disguised ploy to eliminate competition for the select few hunters with access to airplanes (which have harassed other hunters in the past and herded game) and hunting camps within the proposed controlled use area. Many of these privileged few are commercial guides or at least get money for bringing their own hunters by air into this area.

4. **It is not the best means to manage public lands to eliminate, rather than control motorized vehicle usage in areas where habitat is supposedly being degraded.** If in fact, ATV's are degrading the environment to such a degree as suggested by this proposal (which is not an established fact), then restriction to certain trail use areas would be a reasonable compromise and not be so biased against the public.

5. **If motorized vehicles ever do need to be eliminated due to a fragile environment during hunting season, then ALL motorized vehicles should be eliminated including aircraft**, which also are capable of and have in the past harassed other hunters and game. This would be the best way to allow equal access to public lands for the use of all citizens, not just the privileged few who make money off their hunting camps on state land.

Sincerely,

Donald Winston AK 6426589
Donald Winston

Daniel Winston AK 6891344
Daniel Winston

COMMENT# 43

February 15, 2008

I am opposed to proposal number 38 for the following reasons.

1. This proposal suggests eliminating the use of ATV's (All terrain vehicles) in a large portion of unit 20A. I have hunted in unit 20A for the past 20 years. This is a very large unit in which the primary means of transportation for hunters and harvested game are ATV's. I would say that 95% of hunters depend on the use of ATV's to get their meet. Hunting is a great experience that is to be shared by all. If this proposal is supported it will take away another opportunity for a lot of families to get their meat and leave an enormous are for an elite group that can afford to own a plane or pay a guide to take them in one. **This is wrong.**

2. If the use of ATV's are eliminated in the proposed portion of 20A it will great impact the concentration of hunters in other areas where road access (trail) can be found. As hunter's opportunities become more limited and confined to smaller areas the degradation of habitat may begin to be an issue.

3. The most grievous of all is that this proposal directly accuses hunters using ATV's of harassing the game. It this is fat that it is wrong, but much great weight should be put on the hunters using aircraft. I have seen planes drop down and buzz by game on many occasions. In addition, I have been buzzed while in pursuit of game. I have never witnessed game being pursued by an ATV (this would be very impractical).

4. In conclusion, I would like to ask that this proposal not be supported by the board of game, as it's primary purpose seeks to provide exclusive hunting rights to a very small, select group of hunters.

Benjamin M[illegible]

ADL 67744274

COMMENT# 44

ALASKA TRAPPERS ASSOCIATION (ATA)
PO BOX 82177
FAIRBANKS, ALASKA 99708

PROPOSAL #8 – 5 AAC 84.270 - Furbearer trapping; 5AAC 92.085(6) - Unlawful methods of taking big game, exceptions; and 5AAC 92.990(21) - Definitions - (Establishes a trapping season for black bear in Unit 19.) - **Support**

ATA actively supports proposals that increase trapping opportunities wherever the data show that there is a healthy resource to support the activity. We also recognize that trapping is an important tool in the management of predators and should be one of the tools utilized whenever predator population reduction is called for. Recent history in the case of the Fortymile Caribou example clearly shows that trapping can actually be the key to effective control work. This could very well be the case again in GMU 19.

PROPOSALS # 75, 99 and 105 - (as above) – **Support**

ATA supports these proposals based upon the same rationale and for the same reasons as cited in Proposal #8.

PROPOSAL # 16 – 5 AAC 85.057 - Hunting seasons and bag limits for wolverine. (Lengthens the wolverine hunting season in Unit 19) - **Oppose**

ATA opposes this proposal based upon poor fur quality at this time of year and the fact that female wolverine would have young in the dens at this time of year making them more susceptible to harvest.

PROPOSAL #17 – 5 AAC 84.260 - Furbearer trapping – (Modify the season for trapping lynx in Unit 20) - **Support**

This proposal has been submitted by ATA and would allow for a limited incidental take of lynx.

COMMENT# 45

PROPOSAL #18 – 5 AAC 84.270 - Furbearer trapping – (Modifies the trapping season for lynx in Unit 20F) – **Support (with amendment)**

ATA supports this proposal with an amendment of a five lynx bag limit in November, similar to our Proposal 17.

PROPOSAL #53 – 5 AAC 85.060 – Hunting seasons and bag limits for fur animals. (Modifies the season and bag limit for beaver in Unit 21A) - **Oppose**

ATA opposes this proposal as too liberal, but supports Proposal 82 as written, standardizing beaver trapping in Region III..

PROPOSAL #74 – 5 AAC 84.270 - Furbearer trapping – (Modifies the bag limit for trapping lynx in Units 12 and 20E) - **Oppose**

ATA opposes this proposal. We believe that, unfortunately, an unethical trapper would not pay any more attention to a 1 lynx bag limit than a 5 lynx bag limit.

PROPOSAL #82 – 5 AAC 84.270(1) – Furbearer trapping; 5 AAC 85.060(a)(6) – Hunting seasons and bag limits for fur animals and **5 AAC 92.095(a)(3) Unlawful methods of taking furbearers; exceptions.** (Liberalize and simplify beaver seasons, bag limits and harvest methods throughout Region III) – **Support**

ATA supports this proposal. It was developed after several years of hard work by the staff ADF&G and has been discussed with many trappers. It is well written, well documented and allows for additional opportunities to harvest an under-utilized resource.

Submitted on behalf of the Alaska Trappers Association.

Randall L Zarnke 2/14/08

Randy Zarnke
President

Page 2 of 2

COMMENT# 45

RECEIVED TIME FEB. 15. 11:19AM PRINT TIME FEB. 15. 11:54AM

Proposal Number 38

Comment: Oppose the proposal

I have hunted in District 20A for moose over the last 15 years. According to my experience, the issue accusing ATV traffic in the district is exaggerated and is not based on facts. Though I didn't hunt each year, I never saw moose or other wildlife being chased or harassed by 4 –wheelers or other types of all-terrain vehicles. I have however heard of game being harassed and disturbed by airplanes which frequent the lakes, and I have witnessed hunters being harassed by planes. Our hunting party was buzzed and the pilot flew low over nearby game, definitely "deteriorating the quality of our hunting experience" – by plane, not motorized all-terrain vehicles.

For me and my family, hunting is not only a sport but a harvest, and we depend on the moose meat for subsistence. Over the years I have noticed more and more hunters accessing the area, which made it harder for me to get a moose, but it is a right we all have.

The proposal also states that the fragile habitat is being destroyed. I have not witnessed this destruction to any greater degree than any other well hunted areas. The whole proposal sounds like selfish individuals trying to limit access to the district in order to create a more exclusive hunting area for themselves. If the proposal is passed, it would increase the amount of hunters in smaller sections of 20a that are not controlled use areas, resulting in greater environmental degradation.

Oscar F. Chavez

Oscar F Chavez

COMMENT# 46

United States Department of the Interior

FISH AND WILDLIFE SERVICE
1011 E. Tudor Road
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:

FEB 15 2008

FWS/NWRS

Mr. Cliff Judkins, Chairman
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99801-5526

Re: Proposal 97: 5 AAC 92.125 Predation Control Areas Implementation Plan

Dear Chairman Judkins:

The U.S. Fish and Wildlife Service (Service) opposes opening all of Game Management Unit 9 (Unit) as written in Proposal 97. We support a limited program of predator management on the Southern Alaska Peninsula Caribou Herd (the herd) calving grounds in Unit 9 that would focus on wolf packs, with a target of about 20 wolves, on State lands.

We request that such a regulation clearly indicate that lands within the Izembek National Wildlife Refuge and the Pavlof Unit of the Alaska Peninsula National Wildlife Refuge are not open to predator control. These refuge lands are not open to any type of predator control at this time. Predator management on Refuge lands requires a National Environmental Policy Act (NEPA) evaluation, including public involvement prior to its use on any Service lands. Items to consider in this process include: Service policy for predator management, refuge purposes, biological soundness of the program, existence of prey and predator objectives in an approved plan, documented ungulate numbers below carrying capacity, and studies documenting wolf predation as major cause of ungulate mortality.

The Southern Alaska Peninsula Caribou Herd is currently in a serious population decline which has recently resulted in a closure of the Federal subsistence and State hunting seasons of caribou in Unit 9. Recently, a revised management plan was written by State and Federal wildlife managers.

The Alaska Department of Fish and Game with the assistance of the Service conducted surveys and monitoring of the herd to determine possible causes for the decline. Preliminary information indicates that the caribou appear to be healthy however, there is a lack of calves in the current population and the herd is aging significantly. Monitoring of the herd has included collaring of individuals, blood sampling, population counts, composition counts, a parturition survey, and post-calving monitoring. There has been no confirmed cause of the population decline, although predatory influences can impact an already diminished herd.

Previous research and monitoring of this herd provides additional background on past herd population fluctuations. It is thought that the southern herd originally came from the

COMMENT# 47

overpopulation of Northern Peninsula, with excess caribou migrating to the more marginal habitats of the lower portion of the peninsula (Skogg, 1968). The low quality of winter forage and occasional lack of winter food due to severe icing were thought to be factors in natural population control of caribou (Peters, 1994). A 1988 study by Sellers noted that there was a delay in plant growth in the spring on the lower portion of the peninsula (Pitcher et al., 1990) which would also influence the health of the herd during calf production and calf survivability. Volcanic activity in the area may also have a negative impact on the ability of caribou to forage (Peters, 1994) by covering the vegetation with ash and reducing available range to forage. Predation did not seem to be the major controlling factor of the herd when wolf control in the 1940's produced no significant change in the declining population, which continued to decline six and nine years later despite a lack of wolf evidence in the area (Post, 1999). A historical calf mortality study in 1989 indicated that some calves that died after birth showed no evidence of predation or scavenging (Pitcher et al., 1990). However, a study done in 1999 (Sellers, et al., 1999) indicated that of 27 dead calves, 11 of the deaths were confirmed as caused by predators (wolves, bears, wolverine, and eagle).

In summary, the U.S. Fish and Wildlife Service opposes opening all of Unit 9 to predator control and encourages the Board to adopt the changes recommended above. Thank you for considering our comments on this proposal and management of the Southern Alaska Peninsula Caribou Herd.

Sincerely,

Thomas O. Melius

Regional Director

COMMENT# 47

References

Peters, E. 1994. Subsistence Management of Caribou in the Pacific Drainage of the Chignik Unit Alaska Peninsula National Wildlife Refuge. Chapter 1 A History of Caribou Population and Distribution on the Alaska Peninsula. Ph.D. Thesis. Hampshire College, Amherst, MA. 141pp.

Pitcher, K, C. Dau, D. Johnson, R. Sellers, R. West. 1990. Causes of low calf recruitment in the Southern Alaska Peninsula caribou herd and recent herd history. Research Progress Report. Alaska Department of Fish and Game, Juneau. 22pp.

Post, E.S. and D. Klein. 1999. Caribou calf productions and seasonal range quality during a population decline. *Journal of Wildlife Management* 63:335-345.

Sellers, R.A., P. Valkenburg, R.C. Squibb, M. Roy, and B. Dale. 1999. Survival, natality, and calf weights of caribou on the Alaska Peninsula, 1998-1999. Final Report. Cooperative Agreement 99-017.

Skoog, R.O. 1968. Ecology of caribou (*Rangifer tarandus granti*) in Alaska. Ph.D. Thesis. Unversity of California, Berkeley, CA. 699pp.

COMMENT# 47

United States Department of the Interior

FISH AND WILDLIFE SERVICE
1011 E. Tudor Road
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:
FWS/AEA

FEB 14 2008

Mr. Cliff Judkins, Chairman
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99801-5526

Dear Chairman Judkins:

Thank you for your letter of January 27, 2008, requesting a review of the authorization for the use of poison for taking rodents issued by the Board of Game (Board) to the U.S. Fish and Wildlife Service (Service). It is important for the Board to be informed and the Service is pleased to have the opportunity to provide you the requested information.

As I understand from conservations with Larry Bell following your January Board meeting, there are several areas to cover. Larry Bell is working with Will Meeks, the Deputy Refuge Manager for the Alaska Maritime National Wildlife Refuge (AMNWR). They will both be in attendance at the February 29 – March 10, 2008, Board of Game meeting in Fairbanks. They are working on a presentation that clearly describes our past use and benefit of poison to eradicate rats within the AMNWR and an explanation of our future plans for further application. Along with the presentation, they will provide our best data regarding impact to non-target species.

As you know, the Service recently completed an Environmental Assessment (EA) for the future application of poison on Rat Island. The decision on the (EA) will be made later this month or in early March. The options available to the Service are to issue a Finding of No Significant Impact or to develop an Environmental Impact Statement. The Service will continue to work with the Board and the Alaska Department of Fish and Game to notify you of the decision and for any follow up approvals required by the Board.

I look forward to our continued work to deliver the best conservation possible in Alaska. If you have additional concerns please do not hesitate to contact me or Larry Bell at (907) 786-3309.

Sincerely,

Thomas O. Melius

Thomas O. Melius
Regional Director

cc: Greg Siekaniec, Alaska Maritime NWR

TAKE PRIDE IN AMERICA

COMMENT# 47

February 15, 2008
ATTN: BOG COMMENTS
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094

Dear Members of the Alaska Board of Game:

I am representing myself although I am also a member of the Fairbanks Advisory Committee.

PROPOSALS 89 & 90 – 5 AAC 92.540 Controlled Use Areas
OPPOSE

I strongly oppose Proposals 89 and 90 to remove or revise the Wood River Controlled Use Area regulations. The main reason I oppose these proposals is my concern that there would be widespread destruction of the habitat. It is *critical* to *retain* the current regulations governing this controlled use area at a time when we are seeing human populations increase and motorized vehicle use become more prevalent.

My family has a long history in this area, going back to the 1940s. The Wood River CUA is an area where I personally have much experience recreating and hunting by traditional means. I want to make it clear that I am not opposed to using motorized vehicles for hunting and hauling out meat, but in this area the results would be devastating.

The only way motorized vehicles would be able to access the majority of this area in the fall, when the ground is still thawed, is to drive over brush and tundra and swampy ground. The terrain is just not compatible for motorized use and damage would be caused in just one season. Once the damage is once done it's there for decades if not longer.

With all due respect the individuals who wrote Proposal #89, it is wrong on several counts. There is no biological reason for opening the area, the moose harvest objectives can me met by other means. Impact to the Rex Trail would not decrease, rather it would likely increase because this is one of the few access trails into the area. The same user conflicts and access abuse we are seeing now on the Rex Trail and other areas close to the WRCUA would only be exacerbated if this proposal were to pass. The statement that this area is only used by a few guides is false. The area is heavily accessed by fly in hunters, on foot, and by rafts and horseback.

Additional negative impacts include increased user conflicts between hunters who prefer more traditional means of hunting and those who want to use ATVs, ORVs, or air boats. While hunters who use motorized vehicles may not be affected by the hunter on foot, horse, or raft, the same is not true in reverse. I support equal access - meaning there should be places open to all types of hunting, just not all in the same places. Let's not lose the beauty of the landscape and quality of hunting in this area by allowing motorized vehicle access.

My father, Bill Waugaman, taught me was that as hunters we all need to be custodians for wildlife and the land. That's what we need to do here by upholding the Wood River Controlled Use Area designation.

COMMENT#48

February 15, 2008

PROPOSAL 26 – 5 AAC 85.045 Hunting seasons and bag limits for moose
OPPOSE

I believe changing the moose antler restrictions in Unit 20A to allow harvest of bulls with 36" or greater or 2 brow tines would likely result in over harvest since the 50" restriction have been in place since 2002. This change would also draw hunters from all over the State increasing user conflicts and result in more access abuse. I also have concerns that this change would further confuse hunters on yet another antler judgment and yet another inconsistency in the regulations for the area.

I would recommend changing the antler restriction to 50" and 3 brow tines across 20A. This would allow for more moose harvested in areas that are more difficult to access and already hunted in the regular season. This would also be a step towards consistency in antler restrictions.

Thank you for allowing me the opportunity to comment.

Sincerely,

Debra W. Curnow

Debra Waugaman Curnow

COMMENT# 48

Yukon
Environment
Box 2703, Whitehorse, Yukon Y1A 2C6

February 15, 2008

FAXED

Cliff Judkins, Chair
Alaska Board of Game
P.O. Box 11526
Juneau, Alaska 99811

Dear Mr. Judkins:

RE: Comments on Proposal 1 for the Spring 2008 Alaska Board of Game Meeting

We recently became aware of a proposal by the Upper Tanana / Fortymile Advisory Committee to open a limited harvest of the Chisana Caribou Herd in Unit 12, and that this proposal (Proposal 1) will be considered by the Alaska Board of Game at the Spring 2008 meeting.

The Chisana Caribou Herd is a transboundary herd that ranges in both eastern Alaska and western Yukon. Inevitably, management activities on either side of the border of a shared population are going to impact users on both sides. As the management agency responsible for caribou populations in the Yukon, including, in part, the Chisana Caribou Herd, we would like to acknowledge that we were not consulted on this proposal by the proponent and at this time we are not in support of opening a harvest of this herd. The key reasons for our opposition to Proposal 1 are as follows:

- In the Yukon, concerns by White River First Nation, the local big game outfitter, the Yukon Fish and Wildlife Management Board and ourselves, lead to the Chisana Caribou Herd being legally-listed as a Specially Protected Population under the Yukon *Wildlife Act*. As such, licensed hunting is prohibited. In addition, White River First Nation in Beaver Creek, Yukon has instituted a voluntary ban on hunting the Chisana Caribou Herd which has resulted in no subsistence harvest. Opening a harvest in Alaska may undermine conservation efforts resulting in a multiplicative effect with First Nation and resident hunters in Yukon finding little reason to support a continued harvest restriction here.

- This herd was the focus of a 4-year long intensive recovery program between 2003 and 2006. Much goodwill and significant resources from both sides of the border was invested into ensuring the long-term persistence of this herd. It is not yet clear what effect the recovery project has had on the herd and to introduce a harvest this early after the cessation of the intensive recovery work will limit our ability to evaluate the success of our efforts over the next few critical years.

COMMENT# 49

RECEIVED TIME FEB. 15. 3:28PM

- To facilitate the recovery project, a multi-agency recovery team was developed, which included wildlife management agencies and local users in both Alaska and Yukon. This pivotal group was also not consulted on the proposal by the proponent. At their last meeting in July 2007, the decision was made to develop a management plan for the herd. The plan has not yet been developed and we would suggest that initiating a harvest prior to the development of that plan would be premature and may undermine much of the goodwill that was necessary to work towards ensuring the well-being of this herd. The Yukon Fish and Wildlife Branch has set aside funds in the 08/09 fiscal year to go towards completing this plan.

- Genetic evidence suggests that this is a herd that is genetically distinct, and most closely aligned with other populations of woodland caribou (*Rangifer tarandus caribou*), not Alaskan caribou (*Rangifer tarandus granti*) as found elsewhere in the state. The implication being that this may be the only herd of woodland caribou in Alaska.

- In northwestern Canada, all woodland caribou are legally listed under our federal *Species at Risk Act* as a species of Special Concern. Harvest is not prohibited under this designation, but there is the legal requirement that a management plan be prepared, with the goal of keeping the population from becoming Threatened or Endangered. A national (Canada) management plan is forthcoming.

- Sustainable harvest rates recommended for caribou are 2-3% of the herd, the rate selected being dependent on the management objectives. With smaller, recovering herds, a lower rate is recognized as a safe or cautionary approach to re-introducing hunting, providing for growth to the herd. Proposal 1 allocation of 20 bull caribou from this herd represents an approximate harvest rate of 2.6% for the overall herd, and about 9.1% of the bulls in the herd. This is from the Alaska side alone. If hunting was re-introduced in Yukon, it would add to the percent of the herd harvested.

Thank you for considering our concerns. Please feel free to contact me at 867-667-5715 or email Harvey.jessup@gov.yk.ca should you have any questions regarding our opposition to this proposal.

Sincerely,

Harvey Jessup
Director
Fish and Wildlife Branch

cc Dan McDiarmid, Chair, Yukon Fish and Wildlife Management Board
David Johnny, Chief, White River First Nation
Doug Larsen, Director, Alaska Department of Fish and Game
Mason Reid, Biologist, US National Parks Service, Mason Reid
Brian Pelchat, A/Manager, Whitehorse Office, Canadian Wildlife Service

COMMENT#49

RECEIVED TIME FEB. 15. 3:28PM

Attn: Bog Comments

AK Dept of Fish + Game

Board Supports Section 907-465-6094

In support of Proposal 86

Dear Board of Game

Please create a Tangle Lakes State Wildlife Refuge. That way land management can be under the Fish + Game Department who can protect wildlife + habitat as much as possible. Instead of giving this beautiful area over to large scale mining, we can preserve the habitat of this area for generations to come. Thank you

Ellen Americus
P.O. Box 2112
Cordova, AK 99574

COMMENT# 50

Alaska Professional Hunters Association Inc.

HC 60 Box 299C Copper Center, Alaska 99573
(907) 822-3755

February 14, 2008

Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, Alaska 99811-5526

Spring 2008 Board of Game Written Comments

Dear Alaska Board of Game Members,
Please find the following comments for your consideration regarding proposals you will be addressing at your Spring 2008 meeting in Fairbanks. The Alaska Professional Hunters Association Inc. (APHA) has serious concerns with the scope of many of the proposals you will be addressing at this meeting. The professional guide industry represents a significant and important rural economy in Alaska which is dependant upon prudent stewardship of Alaska's wildlife. Many of the proposals you will be considering seek to eliminate non-resident hunter opportunity.

Please consider the following factors when addressing these proposals:

1. **When you eliminate non-resident opportunity for ungulate species you eliminate the vital funding needed to promote active and more expensive management requirements.**

2. **When non-resident ungulate hunting is eliminated, a substantial part of the annual predator harvest which occurs during the ungulate hunts is also eliminated. When you eliminate this non-resident harvest you eliminate in most cases, the most significant annual predator harvest as well.**

3. **The 50 inch or four brow tine legal moose requirement for moose hunters is biologically designed to not affect the reproduction of the moose population. Thus the limited amount of current non-resident harvest is not affecting the overall moose population.**

4. **Historical predator (wolf) management was utilized to enhance ungulate populations. These historic and current efforts were and are conducted in many**

COMMENT# 21

RECEIVED TIME FEB. 15. 3:10PM

cases by professional guide service providers. The resulting gain in ungulate populations has now been calculated into the Amount Necessary for Subsistence numbers which is utilized to eliminate the guide service providers who have and are working so hard to assist in ungulate enhancement. In short: The ANS numbers generated during the highest density of these ungulate species in history and represent numbers that we may never see again, and as such, are unjust and result in a tool utilized to eliminate other user groups.

5. **There are several proposals asking for eliminations or restrictions on non-resident hunting within GMU 19B. Please note that every historical ADF&G annual management plan and report for moose and caribou summarizes that this area has been managed primarily for non-resident or non-local hunting opportunity, as there has been very little local resident hunting due to access considerations. In fact: GMU 19B was defined as a GMU sub-unit for this consideration. Additionally, moose tracking surveys indicate that the moose population in this region is primarily a resident population without any significant transition. Proposals to eliminate non-resident opportunity in this region for subsistence priority are unreasonable and unjust.**

PROPOSALS THAT APHA OPPOSES: 4, 5, 7, 8, 9, 11, 12, 13, 14, 15, 20, 21, 42, 47, 54, 57, 70, 85, 99, 102, 105, 106, 107, 113,

PROPOSALS THAT APHA SUPPORTS: 1, 35, 37, 48, 52, 55, 58, 71, 73, 76, 77, 94, 97, 98, 101, 103, 104, 110, 112

PROPOSALS THAT APHA SUPPORT WITH AMMENDMENT: 22,

Comments per Proposal:

Proposal #1, Support based on its given merit. APHA encourages a non-resident harvest component if possible.

Proposals #4 & #5: Oppose. The current season dates allow for both liberal subsistence opportunity and limited non-resident opportunity. The existing non-resident harvest is not affecting population densities.

Proposal #7: Oppose. Please refer to reference number 4 on pages 1 and 2 of these comments.

RECEIVED TIME FEB. 15. 3:10PM

COMMENT# 51

Proposal #8: Oppose. APHA supports predator management to enhance ungulate regeneration to State Constituted management objectives. However, as Alaska is engaged in constant legal and political battles that are used to raise financial gain for organizations outside of Alaska we ask you to consider that means and methods of harvest that would allow heightened fund raising by these organizations be carefully weighed for their value gained versus potential harm to our existing management programs. In this specific proposal all of GMU 19 is being considered. APHA would suggest that those regions outside of existing Predator Management areas to not be considered with this proposal.

Proposal #9: Oppose. APHA opposes this proposal especially for GMU 19C where there is no evidence that the grizzly bear population is responsible for significant ungulate declines. We believe firmly that existing low-density moose, caribou and sheep populations are the result of wolf predation primarily. To significantly reduce grizzly bear numbers without science to support the objective is not wise conservation. Historic bear numbers are not out of sync with current population densities.

Proposal #11: Oppose. Please refer to reference numbers 1, 2, 4, & 5 on pages 1 and 2 of these comments.

Proposal #12: Oppose. Please refer to reference number 3 on page 1 of these comments.

Proposal #13: Oppose. Please refer to reference number 5 on page 2 of these comments. In addition to number 5 above, APHA firmly believes that that portion of 19B addressed within this proposal received significant scrutiny when the 19A closure occurred.

Proposal #14: Oppose. Please refer to reference numbers 3 and 5 on pages 1 and 2 of these comments.

Proposal #15: Oppose. There is no existing biological science that shows allowance for additional harvestable surplus of moose in this area.

Proposal #20: Oppose. APHA will defer to the board's prudent discretion. APHA supports predator management to enhance ungulate regeneration to State Constituted management objectives. However, as Alaska is engaged in constant legal and political battles that are used to raise financial gain for organizations outside of Alaska we ask you to consider that means and methods of harvest that would allow heightened fund raising by these organizations be carefully weighed for their value gained versus potential harm to our existing management programs.

Proposal #21: Oppose. APHA recommends same season opportunity for residents and non-residents on the August/September portion of this hunt.

COMMENT# 51

RECEIVED TIME FEB. 15. 3:10PM

Proposal #22: Support with Amendment. APHA supports this proposal with an amendment to include some non-resident allocation.

Proposal #35: Support. APHA supports this proposal on its given merits.

Proposal #37: Support. APHA supports this proposal on its given merits.

Proposal #42: Oppose. APHA will defer to the board's prudent discretion. APHA supports predator management to enhance ungulate regeneration to State Constituted management objectives. However, as Alaska is engaged in constant legal and political battles that are used to raise financial gain for organizations outside of Alaska we ask you to consider that means and methods of harvest that would allow heightened fund raising by these organizations be carefully weighed for their value gained versus potential harm to our existing management programs.

Proposal #47: Oppose

Proposal #48: Support. APHA supports this proposal on its given merits.

Proposal #52: Support. APHA supports this proposal based on its given merits.

Proposal #54: Oppose. Please refer to reference numbers 2 & 3 on page 1 of these comments.

Proposal #55: Support. APHA supports this proposal based on its given merits.

Proposal #57: Oppose.

Proposal #58: Support. APHA supports this proposal based on its given merits.

Proposal #70: Oppose. There is no biological reasoning for this proposal at this time.

Proposal #71: Support. We support this proposal based on its given merits.

Proposal #73: Support. We support this proposal based on its given merits.

Proposal #76: Support. We support this proposal based on its given merits

Proposal #77: Support. We support this proposal based on its given merits.

Proposal #85: Oppose. Seasons dates should be the same for residents and non-residents. In many of these areas APHA member service providers have never seen a resident hunter.

Proposal #94: Support. APHA supports this proposal based on its given merits.

Proposal #97: Support. APHA supports this proposal based on its given merits.

Proposal #98: Support. APHA supports this proposal based on its given merits.

Proposal #99: Oppose. APHA will defer to the board's prudent discretion. APHA supports predator management to enhance ungulate regeneration to State Constituted management objectives. However, as Alaska is engaged in constant legal and political battles that are used to raise financial gain for organizations outside of Alaska we ask you to consider that means and methods of harvest that would allow heightened fund raising by these organizations be carefully weighed for their value gained versus potential harm to our existing management programs. In this specific proposal all of GMU 19 is being considered. APHA would suggest that those regions outside of existing Predator Management areas to not be considered with this proposal.

Proposal #101: Support. APHA supports this proposal based on its given merits.

Proposal #102: Oppose. This proposal works directly against our constitutional mandates related to wildlife conservation and *"balance for the whole"* best interest considerations.

Proposal #103: Support. APHA supports this proposal based on its given merits.

Proposal #104: Support. APHA supports this proposal based on its given merits.

Proposal #105: Oppose. APHA will defer to the board's prudent discretion, especially related to brown bears. APHA supports predator management to enhance ungulate regeneration to State Constituted management objectives. However, as Alaska is engaged in constant legal and political battles that are used to raise financial gain for organizations outside of Alaska we ask you to consider that means and methods of harvest that would allow heightened fund raising by these organizations be carefully weighed for their value gained versus potential harm to our existing management programs. In this specific proposal all of GMU 19 is being considered. APHA would suggest that those regions outside of existing Predator Management areas to not be considered with this proposal.

Proposal #106: Oppose. This proposal works directly against our constitutional mandates related to wildlife conservation and *"balance for the whole"* best interest considerations.

Proposal #107: Oppose. APHA will defer to the board's prudent discretion, especially related to brown bears. APHA supports predator management to enhance ungulate regeneration to State Constituted management objectives. However, as Alaska is engaged in constant legal and political battles that are used to raise financial gain for organizations outside of Alaska we ask you to consider that means and methods of harvest that would allow heightened fund raising by these organizations be carefully weighed for their value gained versus potential harm to our existing management programs.

Proposal #110: Support. APHA supports this proposal based on its given merits.

Proposal #112: Support. APHA supports this proposal based on its given merits.

Proposal #113: Oppose. This proposal works directly against our constitutional mandates related to wildlife conservation and *"balance for the whole"* best interest considerations.

Submitted By,

Robert R. Stetter

APHA Executive Director

COMMENT# 51

RECEIVED TIME FEB. 15. 3:10PM

LAW OFFICE OF KNEELAND TAYLOR, P.C.
425 G Street, Suite 610
Anchorage, AK 99501
907-276-6219 telephone
907-279-1136 FAX
email: <kneelandt@alaska.com>

Admitted in Alaska

January 11, 2008

Alaska Department of Fish and Game
P. O. Box 115526
Juneau, AK 99811-5526
FAX 907-465-6094

Attention: Board of Game

Re: Fairbanks Meeting, March, 2008
Proposals 3, 8, 16, 17, 38, 44, 45, 61, 68, 74, 75, 82, 105, 106, 107-112, 113, 123, and 126.

Dear Board Members:

Proposal No. 3. As I understand this proposal, the effect is to prohibit bear hunting in a bear viewing area at Wolverine Creek. The purpose is to make wildlife viewing better for non-consumptive users. I am delighted to see that non-consumptive users are being given some support. I support this proposal although I confess to being unfamiliar with the specifics of the boundaries, etc.

Proposal No. 8. This proposal would authorize bear trapping. I am appalled.

Proposal No. 16. I oppose extending the wolverine trapping season. The dispute over wolverine trapping in Chugach State Park makes clear that the trapping of wolverine in this part of the state, i.e. Southcentral, may have reduced wolverine to unnaturally low numbers for many decades. That seems to be what the area biologists in this part of the state are saying. What we need is a comprehensive review of the population levels, and sustainable take, state wide. Extensions of trapping before such a review is completed put the population in peril merely to satisfy a handful of thoughtless trappers.

Proposal No. 17. I oppose departure from science based management of lynx trapping. That is what this proposal would do. The goal of the BOG should be the conservation of healthy, natural wildlife populations: not the greater profit and enjoyment of trappers.

Proposal 38. Support. I confess to being unfamiliar with the particular geography, but I

COMMENT# 52

RECEIVED TIME FEB. 15. 2:46PM

am pleased to see that efforts are being made to prevent the further destruction of our wild lands by ATV's.

Proposal 44. Support. The BOG needs to be proactive in preventing additional destruction of our wild lands by ATV's.

Proposal 45. The Department of Law's comments are curious. The BOG and ADF&G have for decades provided regulations which concern public safety. For instance, archery hunts, or musket hunts near build up areas in Anchorage. The Department of Law seems in recent comments to be engaged in policy making.

Proposal 61. Oppose. I believe that May is the time of year when wolf puppies are most vulnerable. The BOG should not treat wolves as if they were vermin.

Proposal 68. Oppose. As I understand it, this proposal would allow black bears to be taken in their dens. The BOG should not treat black bears as if they were vermin.

Proposal 74. It appears from this proposal that the Upper Tanana/Fortymile Advisory Committee is thinking in terms of conserving natural populations of these animals. If I am correct in my assumption, then I support this proposal.

Proposal 75. Oppose. Bear trapping should not be authorized anywhere in Alaska.

Proposal 82. Oppose. Rather than focus on the wildlife, i.e. beaver, the ADF&G focuses on trapper convenience. The proposal clearly states that biologically the regions beaver populations "are not likely" to be adversely impacted. I don't think the ADF&G should gamble simply to make things more convenient for trappers. And it is not reasonable to think that populations will be uniformly impacted by the removal of area-specific regulations.

Proposal 105. Oppose. Snaring bears should be prohibited. Period.

Proposal 106. Support. This program should be sunsetted.

Proposals 107, 108, 109, 110, 111, 112. Oppose. All of these are aimed at hunter convenience, and increasing hunter success. No consideration is given to the conservation of naturally occurring wildlife populations is apparent in any of these. The BOG should reject all of these.

Proposal 113. Support. It is time the BOG ended ineffective programs that harm our wildlife resources chasing the goal of making hunting more convenient for hunters.

COMMENT#52

RECEIVED TIME FEB. 15. 2:46PM

Proposal 123. Oppose. Strongly. I live in Anchorage. In most years, during rutting season, I hike and watch the moose in Chugach State Park, near the Glen Alps trailhead. The authorization of up to 50 permits is outrageous. Taking this issue up in Fairbanks is outrageous.

Our presidential primaries demonstrate what happens when people are abused by bad leadership, as with George Bush, Richard Cheney, and Donald Rumsfeld. Bad wildlife management like shooting moose in a heavily used wildlife viewing area, in September, will activate people such as myself who have remained silent for too long.

I expect that the BOG will continue to ignore the broader population, and I expect that this will pass, this year. But the day will come when the pendulum swings our way, toward the public and away from the selfish few who take public resources as their privileged entitlement. Away from those who think they own an entire administrative agency, i.e. the ADF&G.

Proposal 126. Oppose. The upper Ship Creek moose hunt was a fiasco last year. Surely the BOG should take this Anchorage issue up in Anchorage. Authorizing this fiasco a second time, in Fairbanks is outrageous. Incidentally, the ADF&G in its comments says that the only people likely to be suffer are people opposed to moose hunting. I don't oppose moose hunting. What I oppose is the destruction of trails and terrain that go with it, in the case of Ship Creek. In the Glen Alps area, it is the destruction of one tiny wildlife viewing area, consisting of perhaps 200 acres.

I wish to close by pointing out that the ADF&G and BOG need to reexamine their condescending attitudes to publicly minded citizens who don't hunt, but take their time to participate by submitting comments, testimony, etc.

Very truly yours,

Kneeland Taylor

COMMENT# 52

RECEIVED TIME FEB. 15. 2:46PM

ALASKA TRAVEL INDUSTRY ASSOCIATION

February 15, 2008

Alaska Board of Game
Attn: Board of Game Comments
Alaska Department of Fish & Game
Boards Support Section
P.O. Box 115516
Juneau, Alaska 99811

Fax Number: 907-465-6094

Re: Proposal Number 3 – 5 AAC 85.015

Dear Board of Game:

The Alaska Travel Industry Association (ATIA) represents over 1,100 member businesses servicing the tourism industry in Alaska. Many of those members operate bear viewing and lodging businesses reliant on healthy bear populations in the Wolverine Creek area of Redoubt Bay in western Cook Inlet. The ease of access to this area makes it one of the best opportunities for visitors to observe brown and black bears in their natural habitat.

As you know, the Department has undertaken innovative measures to avoid the heavy regulation of this area as is used in the bear viewing area of McNeil River by developing, with public input from private citizens and organizations like ATIA, a voluntary program that has worked relatively well to allow a mixing of local human uses and normal bear foraging. From Department statistics, it appears the population is relatively healthy, those seeking to view bears have had good opportunity to view bears and your Board has adjusted the hunting seasons to give separation to bear viewing and bear hunting periods.

It has been brought to our attention that the number of bears, brown and black, has been lessening in the Wolverine Creek area and some fear this could be due to over hunting. ATIA does not have information to support that claim but is interested in the economic aspects that the perception of fewer bears might have on a continuing and growing clientele to the area.

ATIA asks that in your consideration of the black bear hunting season addressed in this proposal that the Board of Game consider making the near shore areas of Redoubt Bay one where taking of bears is subject to strict management procedures so that the exact number of bears taken in season can be ascertained by Department biologists.

2600 Cordova Street, Suite 201
Anchorage, AK 99503-2745
Tel (907) 929-2842
Fax (907) 561-5727
ATIA@alaskatia.org
www.alaskatia.org

RECEIVED TIME FEB. 15. 2:33PM

COMMENT# 53

Regulations should seek to assure the number of bears in the near Bay area continues to remain at a high level, that level of bear take is closely managed in season, the season is separate from prime viewing months of May to September and that bear viewing habitat, mostly along the shoreline and in the tidal flats, remains a place where bears congregate as a sustainable, healthy population.

Thank you for the opportunity to express our views and hopes for this area. Please contact Mark Miller of my staff if you have any questions.

Sincerely,

Ron Peck
President & COO

COMMENT# 33

RECEIVED TIME FEB. 15. 2:33PM

Alaska Board of Game Region III Meeting
Feb. 29 - March10, 2008

Stony River Traditional Council Proposal Comments

Proposals 8, 9, 83, 99, 100, 103, 105, 112, 137, 138 - Supported. The Stony River Traditional Council, (SRTC), supports proposals that encourage and increase the harvest of predators, due to the decline in moose stocks in GMU 19, and many other areas of the state. When advisory committees in an area sponsor these sort of proposals or proposals to start new comprehensive predator management plans, it is evident that predator management is needed there and RSTC supports them.

Proposals 101 & 104 - Supported. These proposals are to extend the 2 predator management programs for several years - in GMU 19 A, and 19D. These programs are working, but need more time.

Proposals 102, 106, &113 – Opposed. These proposals are attempts to terminate 3 predator management programs. These programs <u>are</u> effective and require more time. The state went through a long period with NO predator control for 11 or 12 years. It is unrealistic to expect there to be a large harvestable surplus in so short a time period

1. All 3 claim they have not been effective in increasing moose harvest. **In Prop 102, (19A), a closure and Tier II have been put in place. How could hunter harvest <u>possibly</u> have increased there??**
2. Also claimed is that these programs are too expensive. **They are not when compared to what it would cost if the ban initiative were passed, and ADF&G personnel were required to do it!**

Proposals 12 & 14 – Opposed. Both of these proposals eliminate antler restrictions and lengthen the moose season in 19B. The sponsor of Proposal 14 didn't get a moose. If these hunters are having trouble getting spike/fork moos in 19B, it is evident that the 19A moose closure needs to be extended into 19, as the Sleetmute Traditional Council, (STC) testified when it made the 19A/B closure proposal 2 years ago . There is no recent information on population density and composition in 19B. Keeping the spike/fork restriction is necessary to insure that some moose are left for recruitment.

Proposal 13 - Supported. (See SRTC comments on 12 and 14.) This Central Kuskokwim Advisory Committee, (CKAC), proposal speaks for itself, and is also supported by the comments made by the Stony Holitna Advisory Committee, (SHAC).
This is what STC **Proposal 64** addressed at the Spring, 2006 BOG meeting 2 years ago.

COMMENT# 54

RECEIVED TIME FEB. 15. 2:15PM

Proposal 87 – Supported. The Holitna-Hoholitna Controlled Use Area is definitely NOT "a frivolous regulation" as its sponsor said. Hunters who live outside of 19A The people living within 19A use much smaller outboard motors for their transportation and hunting due to cost of larger motors, cost of fuel, and lack of jobs and income in the area. There is also no commercial fishing in 19A.

The SHAC comments on this proposal list most of the reasons the 40 hp limit was imposed in the first place.

Making a proposal like this – that would increase the amount of hunting pressure at the present time - when the resource is depleted to the point it is now – would work in opposition to moose population recovery.

Alice Willis - Vice President
Adoeii

COMMENT# 54

Alaska Board of Game Region III Meeting
Feb. 29 - March10, 2008

Lime Village Traditional Council Proposal Comments

Proposals 8, 9, 83, 99, 100, 103, 105, 112, 137, 138 - Supported. The Lime Village Traditional Council, (LVTC), supports proposals that encourage and increase the harvest of predators, due to the decline in moose stocks in GMU 19, and many other areas of the state. When advisory committees in an area sponsor these sort of proposals or proposals to start new comprehensive predator management plans, it is evident that predator management is needed there and LVTC supports them.

Proposals 101 & 104 - Supported. These proposals are to extend the 2 predator management programs for several years - in GMU 19 A, and 19D. These programs are working, but need more time.

Proposals 102, 106, &113 – Opposed. These proposals are attempts to terminate 3 predator management programs. These programs are effective and require more time. The state went through a long period with NO predator control for 11 or 12 years. It is unrealistic to expect there to be a large harvestable surplus in so short a time period All 3 claim they have not been effective in increasing moose harvest.

In Prop 102, (19A), a closure and Tier II have been put in place. How could hunter harvest possibly have increased there??

Also claimed is that these programs are too expensive. **They are not when compared to what it would cost if the ban initiative were passed, and ADF&G personnel were required to do it!**

Proposals 12 & 14 – Opposed. Both of these proposals eliminate antler restrictions and lengthen the moose season in 19B. The sponsor of Proposal 14 didn't get a moose. If these hunters are having trouble getting spike/fork moos in 19B, it is evident that the 19A moose closure needs to be extended into 19, as the Sleetmute Traditional Council, (STC) testified when it made the 19A/B closure proposal 2 years ago. There is no recent information on population density and composition in 19B. Keeping the spike/fork restriction is necessary to insure that some moose are left for recruitment.

Proposal 13 - Supported. (See LVTC comments on 12 and 14.) This Central Kuskokwim Advisory Committee, (CKAC), proposal speaks for itself, and is also supported by the comments made by the Stony Holitna Advisory Committee, (SHAC).
This is what STC **Proposal 64** addressed at the Spring, 2006 BOG meeting 2 years ago.

COMMENT# 55

Proposal 87 – Supported. The Holitna-Hoholitna Controlled Use Area is definitely NOT "a frivolous regulation" as its sponsor said. Hunters who live outside of 19A The people living within 19A use much smaller outboard motors for their transportation and hunting due to cost of larger motors, cost of fuel, and lack of jobs and income in the area. There is also no commercial fishing in 19A.

The SHAC comments on this proposal list most of the reasons the 40 hp limit was imposed in the first place.

Making a proposal like this – that would increase the amount of hunting pressure at the present time - when the resource is depleted to the point it is now – would work in opposition to moose population recovery.

COMMENT# 55

Alaska Office
333 West 4th Avenue, #302 | Anchorage, AK 99501 | tel 907.276.9453 | fax 907.276.9454
www.defenders.org

DEFENDERS OF WILDLIFE'S COMMENTS ON THE PROPOSALS TO BE CONSIDERED AT THE FEBRUARY 29 - MARCH 10, 2008 BOARD OF GAME MEETING IN FAIRBANKS, ALASKA

February 15, 2008

Via Facsimile: 907-465-6094

Mr. Cliff Judkins, Chairman, Board of Game
Ms. Kristy Tibbles, Executive Director, Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Dear Mr. Judkins and Ms. Tibbles:

Defenders of Wildlife ("Defenders") appreciates the opportunity to submit these written comments on proposals that will be considered at the February 29 - March 10, 2008 meeting in Fairbanks, Alaska.

Established in 1947, Defenders is a non-profit membership based organization dedicated to the protection of all native wild animals and plants in their natural communities. Defenders focuses on the accelerating rate of species extinction and associated loss of biological diversity and habitat alteration and destruction. Defenders also advocates for new approaches to wildlife conservation that will help prevent species from becoming endangered. We have field offices around the country, including in Alaska where we work on issues affecting wolves, black bears, brown bears, wolverines, Cook Inlet beluga whales, sea otters, polar bears and impacts from climate change. Our Alaska programs seek to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats while protecting predators that serve as indicator species for ecosystem health. Defenders represents more than 5,800 members, activists and subscribers in Alaska and more than one million nationwide.

Our comments follow. Also, see the attached appendix with 64 individual comments from our members and supporters:

Proposal # 3 – Amend hunting season for black bear in Unit 16 and Wolverine Creek in Unit 16B – Proposed by Board of Game to reduce wildlife viewing conflict – **Support**. Defenders supports this proposal because the original purpose of the viewing area restrictions contemplated all bears, not just brown bears and therefore this proposal will provide the intended protections for black bears.

National Headquarters
1130 17th Street, N.W.
Washington, D.C. 20036-4604
tel 202.682.9400 | fax 202.682.1331

COMMENT# 56

RECEIVED TIME FEB. 15. 4:49PM

Proposal # 8 – Allow black bear trapping in Unit 19 – **Oppose.** Defenders opposes the trapping of bears for the following reasons. Trapping of bears is not allowed anywhere in Alaska, nor does any other western state permit this practice. Bears have never been classed as furbearers under Alaska law. We object to creating a new class of trappable animals. Nuisance bears can already be taken under existing defense of life and property laws. We also object to trapping bears on the grounds of humaneness. Catching and holding large, powerful and potentially dangerous animals in snares and leg-hold traps presents a situation where wounding, loss and injury can occur. Injured bears can escape resulting in prolonged suffering. With no "time-check" requirements, bears that are held in traps suffer by struggling more than other furbearers do. Wounded bears that are likely to escape from traps and snares are serious threats to public safety because they cannot feed normally and are traumatized by the pain that constricted snares cause.

Proposal # 9 – Lengthen brown bear hunting season in Unit 19B and 19C three weeks, from September 1 to August 10 – **Oppose.** As stated by the proponent, this is a predator control proposal. Without a specific plan established by the Board for a bear predation control area, supported by adequate data, there is no basis for adopting such a proposal.

Proposal # 16 – Extend wolverine hunting season in Unit 19 six weeks, from March 31 to May 15 – **Oppose.** None of the interior GMU's have had wolverine trapping seasons this late in the past. Poor pelt quality results in the waste of a resource.

Proposal # 18 – Shorten the lynx season by one month in Unit 20F, from November 1 to February 28, to December 1 to February 28 – **Support.** Greg Gau, the proposal writer, states that trappers are the ones likely to benefit from this change. As Mr. Gau says, "Lynx don't get prime until December; why send unprimed fur to the fur auctions?"

Proposal # 42 – Establish a grizzly bear baiting season in Unit 20B – **Oppose.** We oppose bear hunting using bait, as it has the potential to habituate animals to human foods, may inadvertently boost populations of the target animals by giving them supplemental food, and violates the principle of fair chase. We maintain that hunters and trappers with stealth and weapons have the tools they need to harvest bears without the use of artificial bait stations.

Proposal # 43 – Prohibit big game hunting in parts of Unit 20 a certain amount of time after gaining access by an airboat – **Support.** This proposal helps prevent overharvest, herding, and harassment of game.

Proposal # 44 – Prohibit big game hunting in parts of Unit 20 a certain time after gaining access by an off-road vehicle – **Support.** This proposal supports ethical hunting practices (reducing "running and gunning") and will reduce problems with habitat degradation caused by indiscriminate off-road vehicle use.

Proposal # 46 – Increase bag limit of brown bear in Units 21A and 21D to two bears per year – **Oppose.** This is a predator control proposal as stated by the proponent, without any supporting information. Without a specific plan established by the Board for a bear predation control area, supported by adequate data, there is no basis for adopting such a proposal.

COMMENT# 56

RECEIVED TIME FEB. 15. 4:49PM

Proposal # 52 – Increase Unit 21A hunting bag limit of wolves to 10 per day, and extend the season to August 10-May 31 – **Oppose.** Two national wildlife refuges are within the boundaries of Unit 21A. Raising the bag limit to 10 per day will encourage waste of a valuable resource. Extending the hunting season to May 31 will mean that wolves are being hunted when the fur is no longer prime, and at the height of the pupping and denning period. This time period is typically avoided for reasons of ethics and in order not to waste a valuable resource.

Proposal # 56 – Increase the bag limit on black bears to five every regulatory year in Units 21A and 21E – **Oppose.** A bag limit of five is excessive in Units 21A and 21E, which contain portions of three national wildlife refuges. Bears are relatively slow to reproduce, and should be managed conservatively.

Proposal # 61 – Establish an archery season for wolves in the Dalton Highway Corridor Management Area from August 10-May 31, or May 1-31 – **Oppose.** This is the pupping season for wolves. Orphaning pups by shooting adult pack members is unethical and publicly unacceptable.

Proposal # 68 – Allow taking black bears by denning or other traditional methods in Unit 25D – **Oppose.** Unit 25D is mainly composed of the Yukon Flats National Wildlife Refuge. We are concerned that, while the proponent claims that "traditional methods helped manage the bear population in the past," it would not be just Native Alaskans that would be allowed to conduct this practice. Further, we believe that there is little justification and virtually no public support for actions such as killing bears in their dens. Denning leads to a waste of a valuable resource. Hunting techniques may be used if one wishes to participate in a reduction of predators.

Proposal # 74 – Reduce the November bag limit in Unit 12 and Unit 20E to one lynx – **Support.** This proposal, from the Upper Tanana/Fortymile Advisory Committee, seeks to reduce the excessive trapping of lynx which is occurring under current management. "During recent years a few unethical trappers have begun to abuse the November season ... by specifically setting numerous traps along the highway corridors, intended to catch lynx ... and then reporting those lynx in December to circumvent the five lynx bag limit."

Proposal # 75 – Allow black bear trapping in Units 21 and 24 – **Oppose.** Bear trapping is not allowed anywhere under current State regulations. Considerations for trapping ethics and human safety indicate that bear trapping should not occur anywhere in Alaska except for specific management purposes conducted by professionals (live capture and relocation, for example). See our comments on Proposal 8 for additional rationale.

Proposal # 79 – Allow the taking of black bears in Units 21 and 24 using artificial light – **Oppose.** The practice of denning has been outlawed for many years. Destroying the young in a nest is widely condemned as an unethical style of hunting. Harvesting bears in this manner jeopardizes sustained yield and risks overharvest of a valuable resource. Spotlighting or using artificial light to search for prey has long been widely prohibited for reasons of hunter ethics, fair chase, avoiding excessive harvest, and law enforcement issues.

COMMENT# 56

RECEIVED TIME FEB. 15. 4:49PM

Proposal # 83 – Allow the use of bait or scent lures in Region III units while floating rivers, creeks or lakes – **Oppose**. We oppose bear hunting using bait, as it has the potential to habituate animals to human foods, may inadvertently boost populations of the target animals by giving them supplemental food, and violates the principle of fair chase. We maintain that hunters and trappers with stealth and weapons have the tools they need to harvest bears without the use of artificial bait stations.

Proposal # 86 – Establish a wildlife refuge in the Tangle Lakes Unit 13 area, disallowing hard-rock mining, in order to protect habitat and cultural features – **Support**. According to the proponent, the Cooper Country Alliance, "Large-scale hard-rock mining, and some mineral exploration practices, can harm wildlife habitats and wildlife .... The continuing long-term value of renewable resources in the eastern Denali Highway area exceeds the short-term non-renewable value of any minerals that might be extracted.... This proposal address hard rock mining, not the small-scale placer mining that has occurred in the area for decades; this proposal should not harm small-scale miners .... By addressing the problem now, during a hiatus in mineral exploration, this solution is ... more fair to mining ... companies than waiting until more funds are expended."

Proposal # 97 – Implement a predator control areas plan (5 AAC 92.125) for Unit 9B, 9C, 9E. **Oppose**. Unit 9C is largely composed of Katmai National Park. In general, we are strongly opposed to the predator control implementation plans that, across broad areas of Alaska, seek to remove approximately 80% of the wolves, 60% of the black bears, and various percentages of grizzly bears. Predator control, as currently practiced in Alaska, lacks sufficient scientific backing. Defenders of Wildlife, as well as taking issue with aerial gunning of wildlife on ethical grounds, is concerned with the long-term health of prey populations and habitat conditions when predator control is practiced unscientifically – based on inadequate scientific or anecdotal data, without adequate studies to show a causal relationship between certain predator numbers and prey availability, and without appropriate experimental controls. If predator control is indicated, i.e. in order to prevent an imminent biological emergency, then Defenders of Wildlife will support it provided it is carried out by professional wildlife agency personnel in a humane and cost-efficient manner and has public support.

Proposal # 99 – Allow black and brown bear trapping in McGrath Experimental Micromanagement Area (EMMA), Unit 19D – **Oppose.** See our comments on Proposals 8 and 75. Even with "time-check" requirements, bears that are held in traps will suffer and struggle more than other furbearers, with hazards resulting to bears and humans.

Proposal # 100 – Allow taking black bear cubs and female black bears with cubs to be hunted in Unit 19 intensive management areas – **Oppose.** Defenders of Wildlife does not endorse the taking of bear cubs or female bear with cubs without clear and compelling scientific evidence that such drastic management actions are necessary. No information is presented in the proposal that convinces us that this point has been reached. Bears are slow to reproduce, and should be managed conservatively. We believe that normal hunting practices, using modern tools and stealth, can accomplish the appropriate level of reduction of predator animals, without resorting to shooting bear cubs and female bears with cubs, or taking bears from dens.

RECEIVED TIME FEB. 15. 4:49PM

COMMENT# 56

Proposal # 101 – Extend the Unit 19A predator control plan for six years – **Oppose.** Defenders of Wildlife, Alaska Wildlife Alliance, and Alaska Center for the Environment have submitted a competing proposal which would stop the aerial gunning of wolves in Unit 19A. See our rationale in Proposal 102.

Proposal # 102 – Terminate the aerial wolf control program in Unit 19A – **Support.** This proposal was submitted by Defenders of Wildlife, Alaska Wildlife Alliance and Alaska Center for the Environment. See our rationale within the proposal.

Proposal # 103 – Make it legal to disturb and destroy wolf dens in Unit 19 – **Oppose.** The practice of denning has been outlawed for many years. Destroying the young in a nest is widely condemned as an unethical style of hunting. This proposal creates the potential for unknown mortality if pups in a den are orphaned and starve because adult pack members associated with that den are taken. Taking wolves during in this manner jeopardizes sustained yield, and risks overharvest of a valuable resource.

Proposal # 104 – Extend the Unit 19D East predator control plan (5 AAC 92.125f) – **Oppose.** Defenders of Wildlife, Alaska Wildlife Alliance and Alaska Center for the Environment have submitted a competing proposal, number 106.

Proposal # 105 – Allow black and brown bear trapping by permit in Unit 19 – **Oppose.** See our comments on Proposals 8 and 75 for rationale. In addition, bears – particularly brown bears – are slow to reproduce. They should be managed conservatively.

Proposal # 106 – Terminate the wolf control program for Unit 19D East – **Support.** This proposal was submitted by Defenders of Wildlife and other organizations. We would like to point out that there are several typographical errors that slipped into this proposal during the process of transcribing our submitted proposal. At the Board of Game meeting, we will submit sufficient copies of an amended proposal which corrects these typographical errors.

Proposal # 107 – Modify the predator control plan in Unit 20E to allow the harvest of black bear and brown bear cubs and mother bears with cubs; allow use of snares for trapping bears; allow taking of bears the same day airborne; establish a working group including the Alaska Outdoor Council to recommend protocol for the bear control program – **Oppose.** For reasons stated in other proposals, we oppose the taking of bear cubs and mothers with cubs, and we oppose the use of traps and snares to harvest bears. We have strong objections to same day airborne hunting of predators for numerous reasons, including fair chase issues, harassment potential, and concern that this is management that is not conservative for species (like grizzly bears) that are slow to reproduce. Furthermore, we believe that the Alaska Outdoor Council is neither broadly nor fairly representative of hunters or conservationists in Alaska; to specifically name this group and leave out others suggests the disproportionate influence that this group has on wildlife regulatory policy decision-makers in the State.

Proposal # 108 – Institute aerial or same-day airborne wolf control in Unit 20A in order to bring moose calf survival to 45-50 calves per 100 cows in November – **Oppose.** This proposal reports that the current population of moose in Unit 20A is 14,000 to 15,000 animals but the

COMMENT# 54

RECEIVED TIME FEB. 15. 4:49PM

population objective is lower: 10,000 to 12,000 moose. The proposal acknowledges that the moose is in an overpopulated condition, yet seeks to keep it that way by further increasing the number of wolves killed. Over the last five years, 18% of all wolves reportedly killed by hunting and trapping statewide were those killed in Unit 20. Arguably, a shortage of predators is the very problem that has led to the very serious, current problem of the moose being overpopulated and above carrying capacity. Less predator control is needed in Unit 20A, not more. This proposal moves us in exactly the wrong direction.

Proposal # 109 – Increase the intensive management objective to 12,000 to 14,000 moose for Unit 20A – **Oppose.** The moose in Unit 20A show numerous, classic, density-dependent symptoms of malnourishment. The twinning rate is approximately 7%, as compared to 30% or 70% elsewhere in the state. The current intensive management objective of 10,000 to 12,000 should not be adjusted upward to the higher current, unsustainable number which is creating negative impacts on the habitat and on the viability of the moose.

Proposal # 110 – Implement a predator control plan (5 AAC 92.125) and reduce wolves in Unit 20A to inflate the population size of the Delta caribou herd – **Oppose.** See our comments on Proposals 97, 108 and 109 for rationale.

Proposal # 111 – Expand the Unit 20E predator control area – **Oppose.** See our competing Proposal 113.

Proposal # 112 – Implement a wolf control plan for Unit 21E without waiting two years for the Board to meet after the intensive management plan is drafted and adopted – **Oppose.** See our comments on Proposal 97, 99, 108 and 109 for rationale.

Proposal # 113 – Terminate the aerial predator control program for Units 20E and 25C – **Support.** This proposal was submitted by Defenders of Wildlife, Alaska Wildlife Alliance and Alaska Center for the Environment.

Thank you for giving our comments your thoughtful consideration.

Sincerely,

Tom Banks

Tom Banks
Alaska Representative
Defenders of Wildlife
333 West Fourth Avenue, Suite 302
Anchorage, Alaska 99501
(907) 276-9453

COMMENT# 56

RECEIVED TIME FEB. 15. 4:49PM

Defenders of Wildlife – Alaska Member/Supporter Comments

64 comments sent on Feb. 14-15, 2008

First_Name		City	State	ZIP	Response_Text
A	A	Juneau	AK	99801-1612	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Aimee	S	Homer	AK	99603-0344	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Alan	S	Denali Park	AK	99755-0203	What is with the BOG? How many times do Alaskans have to vote against aerial hunting before you'll listen? Please quit trying to manage Alaska as a moose and caribou farm. Please consider my comments when reviewing Proposals 75, 78, 79, and 107, as they
Amarantha	H	Homer	AK	99603-9404	As someone who cares about conservation, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Proposals 75, 78, 79, and 107, as they w
Amy	M	Juneau	AK	99801-1176	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
April	W	Anchorage	AK	99504-3724	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Arthur	G	Fairbanks	AK	99709-5014	As a 39-year resident of Fairbanks, a former hunter and one who has many friends who still hunt, I am writing to urge that proposals 75, 78, 79, 101, 104, and 107 be rejected. As mentioned below those dealing with bear hunting in various forms are abhorr
Becky	B	Chugiak	AK	99567-2569	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr

COMMENT# 56

Defenders of Wildlife – Alaska Member/Supporter Comments

64 comments sent on Feb. 14-15, 2008

Becky	D	Chugiak	AK	99567-0458	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Brooke	S	Sitka	AK	99835-9504	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Bud	B	Anchorage	AK	99508-4222	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Carolyn	R	Anchorage	AK	99502-1848	As an Alaskan who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing
Carrie	G	Palmer	AK	99645-8204	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Cassondra	B	Anchorage	AK	99507-4131	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Cheryl	H	Ketchikan	AK	99901-6257	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Christine	B	Anchorage	AK	99508-5416	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Christopher	B	Anchorage	AK	99501-2341	As someone who cares about wildlife conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when rev

RECEIVED TIME FEB. 15. 4:49PM

COMMENT# 56

Defenders of Wildlife – Alaska Member/Supporter Comments

64 comments sent on Feb. 14-15, 2008

Dale	K	Anchorage	AK	99516-3680	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Dawn	B	Anchorage	AK	99508-4713	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Deborah	E	Anchorage	AK	99517-2826	As an Alaskan born life long resident of Alaska and someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbank
Deborah	V	Anchorage	AK	99516-3150	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Delisa	R	Wasilla	AK	99654-9274	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Dorrie	F	Sitka	AK	99835-9528	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Faye	H	Kotzebue	AK	99752-1238	As an Alaska resident for more than 20 years who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please cons
Greg	B	Juneau	AK	99801-8218	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Hayden and Bonnie	K	Gustavus	AK	99826-0138	As 40 year Alaska residents who care about conservation and science-based wildlife management, we're writing to express our opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider our commen

COMMENT# 56

Defenders of Wildlife – Alaska Member/Supporter Comments

64 comments sent on Feb. 14-15, 2008

Heather	B	Fairbanks	AK	99708-0661	As an Alaskan who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in my hometown of Fairbanks. Please consider my comments
Heli	S	Espoo	AK	2320	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
James	K	Fairbanks	AK	99701-1639	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Jeanette	H	Anchorage	AK	99507-5404	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Jebarri	D	Homer	AK	99603-9404	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Jeff	D	Homer	AK	99603-9404	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Jennifer	C	Anchorage	AK	99508-3017	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
John	M	Anchorage	AK	99501-4300	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. The good ole' boy(girl) network continues to
joseph	O	Anchorage	AK	99516-2319	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr

COMMENT# 56

RECEIVED TIME FEB. 15. 4:49PM

Defenders of Wildlife – Alaska Member/Supporter Comments

64 comments sent on Feb. 14-15, 2008

Joseph	H	Anchorage	AK	99501-6308	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Joseph	P	Girdwood	AK	99587-0682	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Kendell	M	Fairbanks	AK	99708-3484	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Kristy	W	Wasilla	AK	99654-9525	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Lance and Ann	S	Sitka	AK	99835-6194	Please consider my comments when reviewing Proposals 75, 78, 79, and 107, as they will have significant impacts on Alaska's bears. Please uphold Alaska's tradition of ethical hunting by rejecting the following proposals: * Proposal 75: To allow black be
Laura	H	Anchorage	AK	99501-5751	As someone who cares about conservation and science-based wildlife management, I'm , writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Leslie	M	Anchorage	AK	99501-2320	As someone who cares about wildlife conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when rev
Linda	M	Fairbanks	AK	99709-4112	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. As a citizen of Alaska I am once again appeali
Lois	G	Homer	AK	99603-1475	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr

COMMENT# 56

RECEIVED TIME FEB. 15. 4:49PM

Defenders of Wildlife – Alaska Member/Supporter Comments

64 comments sent on Feb. 14-15, 2008

Luz	G	Anchorage	AK	99515-2548	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Martin	A	Elmendorf AFB	AK	99506-2005	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Mary	M	Chugiak	AK	99567-1294	There are more issues affecting wildlife in our state than being considered. As increased human sprawl and environmental changes impact wildlife populations, wildlife (bears) are forced to adapt quickly which is difficult with shrinking habitats/changing
Michael	Q	Kasaan	AK	99950	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Michele	P	Anchorage	AK	99504-1545	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Olga	M	Anchorage	AK	99509-0373	Murder. Death. Carnage, to kill a mother and a child. What are you trying to accomplish? You are KILLING Alaska! Now you target women and children too? NO. The ECOSYSTEM will be ruined if you extinct THE BEAR POPULATION!! Don't do it. There is NO reason
Pamela	N	Douglas	AK	99824-0518	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Patricia	L	Anchorage	AK	99516-2960	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Richard	S	Douglas	AK	99824-5210	I am an Alaskan hunter and hunt every year on Admiralty Island. I've also hunted in the Brooks Range and with a local resident in Ambler and Kotzebue. I ask that the Board of Game promote ethical hunting practices. While I have not hunted bear, I respect

COMMENT# 56

RECEIVED TIME FEB. 15. 4:49PM

Defenders of Wildlife – Alaska Member/Supporter Comments

64 comments sent on Feb. 14-15, 2008

Robyn	S	Homer	AK	99603-9328	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Sandra	S	Juneau	AK	99803-4072	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Shannon	M	Eagle River	AK	99577-6901	I'm writing about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please: OPPOSE Proposals 75, 78, 79, 101, 104 and 107 and SUPPORT on Proposals 74, 102, 106, and 113 Proposals 75, 78, 79, and 107, will have sign
Sherri	M	Juneau	AK	99803-5852	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Steven	J	Anchorage	AK	99523-0007	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Terri	P	Anchorage	AK	99507-6127	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Terry	P	Willow	AK	99688-9705	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Tina	S	Elmendorf AFB	AK	99506-4534	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr
Vanessa	H	Fairbanks	AK	99707-1492	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr

COMMENT# 56

Defenders of Wildlife – Alaska Member/Supporter Comments

64 comments sent on Feb. 14-15, 2008

Wendy	W	Anchorage	AK	99503-3623	As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks. Please consider my comments when reviewing Pr

Full text of typical comments:

As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks.

Please consider my comments when reviewing Proposals 75, 78, 79, and 107, as they will have significant impacts on Alaska's bears. Please uphold Alaska's tradition of ethical hunting by rejecting the following proposals:

*** Proposal 75: To allow black bears to be trapped in Units 21 and 24 -- huge areas of the state.**

*** Proposal 78: To allow black bears (including cubs and sows) to be killed in their dens.**

*** Proposal 79: To allow the use of spotlights to make it even easier to kill bears.**

*** Proposal 107: To allow brown and black bears, including cubs and mothers, to be killed using snares and same-day airborne hunting.**

These proposals lack any biological justification and fly in the face of decades of tradition where cubs and mother bears have been protected from hunting. Such practices have been generally condemned as unethical hunting and outlawed or traditionally avoided for many years for good reason. We should continue to protect cubs and sows.

And, equally important, I hope you will also OPPOSE:

*** Proposals 101 and 104: To extend controversial, unnecessary and costly aerial predator control programs in large parts of Alaska (Units 19A and 19D) for years.**

After a thorough review of the programs to date, Defenders of Wildlife has offered competing Proposals -- 102, 106, and 113 -- to discontinue aerial predator control in these areas, and also in Units 20E and 25C, to uphold the will of the people of Alaska who have twice voted to end or severely limit (NOT expand) this practice.

I hope you will acknowledge the Alaskan public's broad opposition to this practice and vote YES on Proposals 102, 106, and 113.

In addition, I support Proposal 74, which was proposed by the Upper Tanana/Fortymile Advisory Committee to reduce the bag limit on lynx (to one) in Unit 12/20E.

The decisions made by the Board of Game have lasting consequences for Alaska's wildlife, wild lands, and the people who, like me, enjoy these wonderful natural resources.

Thank you for your time. I hope you will take my views into consideration as you review these important proposals.

COMMENT# 56

RECEIVED TIME FEB. 15. 4:49PM

To the Board of Game Members

Regarding the following Proposals:

91 - Airboat restrictions on Toklat/Kantishna
92 - Nenana CUA and airboat restrictions in NCUA

Stance: Support of both proposals

Reasoning: Airboat operation both on the river and on land near the river directly impacts my hunting experience and potential success. The extreme noise generated by airboats in the vicinity makes traditional methods of hunting moose impossible - hearing/listening for animal movement, as well as using scraping, calling, and other hand techniques. To alleviate the issue, I've moved further off the river, only to have the problem follow as airboats are more and more moving off the river and are being used terrestrially, even to the extent of running across extensive areas of dry ground, using trapline trails, and many new section lines/survey lines recently cut for seismic exploration of natural gas. This has had a direct, negative impact on the hunting experience and my attempts to teach my children how to hunt - it has resulted in several disappointing trips and experiences for myself and my family.

The reintroduction of the Nenana CUA, and an associated regulation(s) limiting airboat usage during moose season in the areas described in these proposals, is both reasonable and justifiable. CUA's have been proven across the state to be a useful tool to address issues such as transportation concerns, as well as habitat alteration/destruction concerns, while not eliminating other reasonable methods of access.
Both of these proposals fairly address these concerns and need to be implemented.

Respectfully,

Mike Brase
Fairbanks, Alaska

COMMENT# 57

P.O. Box 84235
Fairbanks, AK 99708
bigpolarbear@acsalaska.net
907-455-7083

February 15, 2008

Alaska Dept. of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax 907-456-6094

Dear Madam or Sir,

I would like to express my support for Proposal 86, which would create a State Wildlife Refuge in the Tangle Lakes Area. I have made about a dozen trips to this region including driving the Denali Highway three times and canoeing the Delta/Clearwater Rivers on several occasions.

This vicinity is full of wonders. These include outstanding views of the Alaska Range, wide-open expanses of tundra and pristine examples of boreal forest. There are archeological sites and well preserved fossils in the limestone rock, which remind us of our past. The Tangle Lakes are home to loons, grebes, swans, terns, ducks and several species of fish. Creation of a refuge would provide valuable habitat for the Nelchina caribou herd, which is hunted and photographed. The hiking and canoeing possibilities seem endless. And it is possible to drive to this beautiful place in one weekend and back from Fairbanks.

I feel confident that creation of a state wildlife refuge would be a worthwhile contribution to the quality of life of those living an appreciated legacy to our children.

I look forward to your response and appreciate the opportunity to express my support for this remarkable area.

Sincerely,

Andrew M. Keller

Andrew M. Keller

COMMENT# 58

COMMENTS FOR BOARD OF GAME MEETING IN FAIRBANKS 2/29/08-3/10/08

Submitted by: Larry Dalrymple
767 Chena Hills Drive
Fairbanks, Alaska 99709

Proposal #17-- Support

I also believe the Lynx Tracking Harvest Strategy is unnecessarily restrictive.

Proposal #20—Support

I see no down side to this proposal, as there appears to be an abundance of grizzly bears in GMU 20B.

Proposal #25, 27, 28, 36—Proposals to terminate the antlerless hunt in GMU 20A and 20B.

Please see Proposal #130 below.

Proposal #26—Redefine legal bull in GMU 20A—Oppose

I oppose this proposal for several reasons. First, I think it is premature to make this change. There was no moose survey taken this fall, and we therefore have no confirmation of a high bull/cow ratio. All we do have is the word of hunters who have been hunting the main corridors around the Tanana River, and Rex trail, indicating that the ratio is too high. However, as stated below, a large majority of the "resident moose", or non-migrating moose (a majority being antlerless), have been taken out of those areas during the antlerless hunts the last three seasons.

Additionally, we already have a large influx of hunters into this GMU, due to the advertised "surplus of moose", and making this the only area in the state with a 36" and two brow tines restriction (versus 50"/3 brow tines) will cause an additional influx of hunters into the same area that has limited access, especially when it is advertised in the papers that this GMU

COMMENT# 57

RECEIVED TIME FEB. 15. 8:36PM

apparently "has a huge surplus of bull moose, which is the reason for this action".

ADF&G already has a tool to reduce a high bull/cow ratio, and that is the "any bull permit". Last year, 500 permits were issued. Less than half of those were hunted, and a low number of "any bulls" were taken. I understand that ADF&G has a limit of 500 permits that they can issue. I would prefer increasing that limit, to reduce any high bull/cow ratio, and target the zones that are high, rather than changing the antler restriction.

Proposal #33—Oppose

There is no justification for this action, as the biologists factor this in when they determine the number of permits to put out on a draw hunt, i.e., they figure that only about 25% of the permittees will be successful, at best.

Proposal #44—Oppose

While I strongly support rules and regulations that protect Alaska's lands from needless destruction, like that that is occurring on the Rex Trail, it is not within the jurisdiction of the BOG to make rules and regulations regarding the use of vehicles on State land. That belongs to various other State agencies.

Proposal #52—Support, as amended

Require non-residents to purchase a tag.

Proposal #73—Oppose

I don't believe there is biology to support this change in season in 26C. I believe the moose population in this GMU is crashing or has already crashed.

Proposal #76—Support

This area is a top producer of good sheep, and receives a lot of interest. Unfortunately there are a limited number of landing areas for aircraft, and

COMMENT# 59

limited number of drainages to hunt, etc. Dividing the season would allow a more quality hunt for everyone.

Proposal #77—Oppose

This is a ridiculous proposal. It unfairly restricts a resource that should be open to all legal applicants.

Proposal #85—Support, with amendment

The amendment is regarding the season dates:

Residents: August 5-September 25
Non-Residents: August 10-September 20

A sheep hunt of any kind is one of the highest quality, and toughest hunts a person can undertake. It is difficult for residents to compete with the resources that a guide/outfitter brings to this type of hunt, mainly because there is so much money involved.

Many other states have this type of resident preference regarding season openings for things like elk, moose, deer, antelope, and upland birds.

I moved the opening back to August 5 for residents for a reason. Most sheep hunters will be in the field 2-4 days prior to the season opening. Opening 5 days early, instead of the proposed 2 days early, would allow a good chance for the resident hunter to get into the field, harvest an animal, and leave, before the non-resident season opens. This would allow for a higher quality hunt for everyone. Additionally, there are a limited number of aircraft landing areas in most sheep areas, and this would spread out their use and decrease congestion in most areas.

Proposal #89—Oppose

I, of all people, should be supporting this proposal. I own property at the intersection of the Rex Trail, and the Wood River. One of my property

boundaries is the Wood River Controlled Use Area. I have various motorized vehicles on my property, and could use them to access that area (where possible).

However, over the last 5 years, I have personally observed the destruction caused by motorized vehicles, both on and around the Rex Trail. This destruction is being caused by all kind of vehicles, and is showing up as hundreds of vehicle tracks throughout the tundra and lowlands on both the north and south side of the Wood River—tracks that will be visible for over a hundred years. These vehicles have destroyed the trails, mowed down trees, and have thermal erosion trenches up to 10 feet deep and hundreds of feet long.

The other main reason that I oppose this proposal, is that it will not accomplish what the submitters indicate it would. I have traveled the Rex Trail, into my property many times—in the fall and winter (however I have been unable to travel it in the fall recently, because of the condition of the trail). There are just a handful of locations on the north side of the trail (the WRCUA) that would allow ATV travel, because of the type of terrain. Well over 80% of the terrain is tundra and/or wetlands, which is why the Rex Trail itself is in the shape it is in. The submitters have indicated that, opening up that area, will allow significantly more area to moose hunters, to increase the take of moose, both bulls and cows, in that area. However, is it really worth opening up the thousands of acres of pristine wilderness for the handful of additional moose that could be taken.

Another reason that I object to this proposal is that, if opened, there would be no oversight or enforcement of ATV and/or ORV use in that area. DNR currently is responsible for the permitting and use of the Rex Trail, and would be responsible for oversight of this area also. DNR has no enforcement authority and the State Troopers are not staffed to provide the oversight necessary to assure that the entire Controlled Use Area would not eventually end up looking just like the Rex Trail.

The last reason that I oppose this proposal is that I believe that Hunters need a mix of land available to hunt in—land in which ATV's are allowed; land for airboaters; land for walk-in only; and, land which has limited access (in this case aircraft, walk-in, and horseback.

COMMENT# 59

Proposal #90—Oppose

See #89 above.

Proposal #94—Support

This CUA is a huge land area that is closed off to aircraft hunters who want to land on lakes, away from the Koyukuk River. It essentially has created a private hunting area for boat hunters on the river, and excludes hunters from the large area away from the river.

Proposal #102—Oppose

Fish and Game needs these tools to adequately manage the resource.

Proposal #106—Oppose

See #102 above

Proposal #109—Support, with amendment

The population base in 20A should be put on hold until ADF&G can conduct a survey, as one could not be conducted this year. Additionally, there is a large amount of public dissatisfaction with the antlerless hunt, and the biology, or lack of biology, behind it.

Proposal #113—Oppose

See #102

Proposal #130—Proposal to reauthorize the antlerless hunt in GMU 20A (and includes the proposals to eliminate the antlerless hunt in GMU 20A).

I can support the reauthorization, but with strict conditions. Those conditions are:

-The definition of antlerless moose, be changed to a "cow moose, not accompanied by a calf moose.

COMMENT# 59

- That no antlerless moose be taken from zones #1 and #3.

-That no more that 200 antlerless moose be taken in the 2008 season in this GMU.

-That the harvest be focused away from the Tanana River, the Rex Trail, and the Gold King Airstrip.

If these conditions are not acceptable to the Board I do not support this reauthorization.

I personally recommend that ADF&G establish two antlerless seasons—the first being during the normal rifle season of Sept 1-Sept 25, and the second from December 1-February 28. HOWEVER, the later season would only be used in the case that the quota is not met during the earlier season. Additionally, I propose that the later season ONLY be open in the southern portion of Zone #5. Also, I propose that the hunt be a Registration Hunt, so that ADF&G can terminate the hunt when the quota is reached.

I believe that the antlerless hunts conducted in the past three years in this GMU, have severely depleted the "Resident Moose", or non-migrating moose in Zones 1, 2, and 3. Which is the reason that many hunters how have hunted the Tanana River and sloughs, the Nenana River, and areas near Delta report seeing no moose during the regular season—The migrating moose have already left for the foothills and the resident moose have been shot out. Therefore, I also recommend that the earlier hunt be limited to only the middle part of Zone #2, the southern portion of Zone #4 (away from the Rex Trail), the southern portion of Zone #5 and the southern portion of Zone #6.

COMMENT# 59

Atten: BOG Comments
Alaska Fish & Game
Boards Support Section
Fax: 907-465-6097

Dear Board Members:

In regards to proposals # 89 and 90 to reduce or eliminate the Wood River Controlled Use Area, I am firmly against these proposed changes.

I first came to Alaska in 1999 for a traditional methods - fair chase sheep hunt in the Wood River Controlled Use Area. I was so impressed by such a unique opportunity that I moved to Fairbanks at the first opportunity, and have enjoyed that area as much as I possibly could ever since. In 2003 I took my father on a sheep hunt in the area, and although I didn't get a ram, he said it was the most fun he had ever had, and was very glad for the experience.

I grew up in Utah as an outdoorsman and hunter. I spent extensive amounts of time in the field both for pleasure and as an employee of Utah Division of Wildlife Resources. I've traveled and explored quite a bit of the Intermountain West on foot, horseback, and with all sorts of motorized vehicles. Unfortunately, I've seen a lot of examples of what can happen to an area with soft soils when wheeled vehicles traverse it. The Rex trail is an unfortunate local example. I would hate to see that kind of problem develop in the Wood River area.

In closing, the Wood River Controlled Use Area is a precious jewel. I sincerely hope we can pass it on for future Alaskans to enjoy as much as I have.

Thank you,
Bill Rensel

Bill Rensel
1967 Yankovich Road.
Fairbanks, Alaska

COMMENT# 60

RECEIVED TIME FEB. 15. 6:03PM

2/15/08

Attn: BOG COMMENTS:
Alaska Department of Fish and Game
Boards Support Section
In Reference to Proposal 86

To whom it may concern:

As a 12-year resident of Alaska and a business owner in the Fairbanks area, I would like to join in with the many other Alaskans that would like to create a "Tangle Lakes State Wildlife Refuge". The Denali Highway area is one of our favorite spots to visit. We love the rough road that keeps us driving slow enough to actually enjoy the scenery with is spectacular views. We love the wildness of the area, we enjoy mountain biking and hiking on the trails, camping, staying at the lodges, canoing the area lakes and rivers. What a magical spot for all.

Please do not consider it another wild place to be sold off. Keep this area beautiful and wild and undeveloped.

Thank you, Connie Page

P.O. Box 10708,
Fairbanks, AK
99710
907-457-7243

COMMENT# C1

REGION 3 PROPOSALS

Marty Laudert
Fairbanks Ak

Proposal #26 DISAPPROVE Keep antler restrictions the same except amend it to three brow tines for residents for the entire Unit 20A.

Proposal # 85 APPROVE but amend.

DATES:
RESIDENTS: August 5th. – September 22nd.
NON-residents: August 10th. – September 20th.
Two days is not enough time and five days would be more acceptable.

Proposal # 89 DISAPPROVE no motorized access!

Proposal #90 DISAPPROVE

Please do not allow the Wood River Controlled Use Area to be opened up to motorized vehicles, areas of traditional hunting should be preserved. There are enough motorized areas available for those who need an ATV for transportation.

Proposal #130 Disapprove of Anterless Hunt

If cows must be harvested, they should only be harvested from the high density areas of Zone 4 & 5 and the middle of Zone 2. The season should close before the bulls lose their antlers, open season earlier if necessary.
Leave the antler restrictions in place – spike, fork, 50 with three brow tines for residents and 50+ with four brow tines for nonresidents. Make all of 20A three brow tines for residents.

COMMENT#

RECEIVED

JAN 11 2008

BOARDS
ANCHORAGE

Attn: Scott
Public Comment
BOG Interior Mtg

January 2, 2008
Box 553
Wales, AK

AK Department of Fish & Game
Wildlife Conservation-Information Management
333 Raspberry Rd.
Anchorage, AK 99518-9981

Sirs;

I Raymond Seetook Sr. writing this letter concerning Unit/Subunit 22E with moose season August & September little change for hunters to get one because of lack with roads and moose come around before season open, after that they are gone.

Before our season was changed who ever can go out for moose use to get moose to feed the family, but not for a whole year.

Snow, trail, weather, daylight conditions are bad, because we have to go long ways to hunt, and so called internet say trail & weather conditions are good, try living in the bush, because of gasoline, oil price's and we can't live out our store's everyday and not very many jobs in the bush.

Maybe we need roads like bigger towns or city's, so we can get around more or would it make it too easy for people?

Their are wolfs & wolverines may be killing them off too, to eat, they roam all over country any time, not like us, maybe some hunters or people have better saying or more comments or outputs, to help hunters and the village

COMMENT# 63

to see if we can get extended for month of January little more day light and better chance to hunt and get a moose.

We need answers soon as possible, thank you for your time and help.

Sincerely,

(907) 664-3371 Raymond Seetook Sr.

Jerry J. Seeadlook

Ellen J. Richard

A. M. Oxl

Joanne Keyes

Sean C. Komonaseak Sr.

Veronica L. Oxereok

Move Back to August + March

CC:

Wales Native Corportion

Native Village of Wales

City of Wales

(907) 664-2125 → Frank K. Oxereok Jr.

P.S.

It would be best if the original season can be reinstated Aug. - March due to lack of snow for sno-machine travel and too much for ATV's. Gas prices & weather conditions; short daylight hrs etc. "Nobody got moose this year because the animals arent around during our short season."

664-3079 Clyde E. Oxereok

Arthur Ahkinga

Reuben A. Olanna Sr.

Peggy Olanna

[illegible]

Walter M. Weyapuk

Clyde K. Ongtowasruk Jr.

Daniel K. Omedelena

Jerry Crisci

Kimberly A. Oxereok

Yvonne R. George

Zachary R. Milligrock

Shawn E. Richard

COMMENT# 63

ALASKA STATE LEGISLATURE

Juneau
State Capitol Bldg., Rm. 513
Juneau, AK 99801-1182
Phone (907) 465-4976
Fax (907) 465-3883
Toll Free 866-465-4976

Fairbanks
1292 Sadler Way, Ste. 323
Fairbanks, AK 99701
Phone (907) 452-6084
Fax (907) 452-6096

Member
House Finance Committee
Legislative Budget & Audit

REPRESENTATIVE MIKE KELLY
HOUSE DISTRICT 7

February 14, 2008

Alaska Board of Game
Alaska Department of Fish & Game
Boards Support Section
P. O. Box 115526
Juneau AK 99811-5526

RECEIVED
FEB 20 2008
BOARDS

Dear Members of the Board of Game:

Attached is a letter endorsed by 34 individuals who have hunted in Unit 21, and who have joined together to provide information and express concerns about the direction of game management in Unit 21. Included in the attachment are comments regarding proposed regulatory changes the Board of Game will consider at the Spring '08 meeting in Fairbanks.

My office got involved because of phone calls and personal contacts we and Senator Wilken's office received, beginning two years ago, concerning increasingly complex and confusing game regulation changes in Unit 21, specifically affecting the Nowitna (Novi) River drainage.

At that time I met with Mr. David James, Fish & Game Regional Supervisor in Fairbanks. My staff and I would like to take this opportunity to again thank Mr. James and members of his team who provided the information we requested, including backup material related to regulatory actions applied to Unit 21 beginning in the late 1990's and continuing to present. We were treated with professionalism, courtesy, and candor. I don't remember our office ever having received better cooperation and results from a State departmental information request.

Recently our office was contacted to assist Unit 21 hunters in defending against another round of regulation proposals some feel are aimed at driving hunters away from the Novi, a hunting resource many rely upon to feed their families. They feel it is bad practice to force hunters into game units closer to population centers which receive considerably more resource pressure than hunters apply to the Novi.

COMMENT# 64

Alaska Board of Game February 14, 2008

My family and I have personally hunted the Novi since my father took me along on a Novi hunt 40 years ago this fall and brought meat home for our family. Our family still hunts the Novi. This will explain why my name is on the attached list. Two generations of Senator Wilken's family have also hunted the Novi to put meat on the table, which explains why his name is included on this list.

We have provided contact information for each person on the list for your convenience. If there is additional information or assistance we can provide, please contact me or Sue Stancliff at 465-4976. Thank you for your attention to this matter.

Best Regards,

Representative Mike Kelly

Gary

Senator Gary Wilken

COMMENT# 64

COMMENTS ON GAME UNIT 21 REGULATION PROPOSALS
February 15, 2008

We have hunted and/or currently hunt the Nowitna (Novi) River in Unit 21, particularly the area above the Little Mud River. We are mostly longtime Alaskans with families who have historically relied on our Game Board representatives to protect our interests. However, since 1998 there has been a relentless increase in complex regulations/restrictions applied to Unit 21. The situation became so frustrating during recent revisions that many hunters went afield, confused and angry. Visits to ADF&G for information and clarification often didn't help matters. Some federal land managers would prefer that Alaskan hunters, fishermen and trappers leave our public lands. Hopefully the Board and ADF&G are not flagging in their struggle against that agenda. *Land Gone Lonesome*, by Dan O'Neill, should be on the reading list for Game Board members.

To many of us it appears that ADF&G has conceded game management on the Novi to the feds. We understand the ongoing Fed-State struggles, combined with lean funding for the Department, makes the situation difficult. However, the impact on Alaskans in the field is what counts, and we must resist over-control and one-size-fits-all regulation. In the past we have picked up Unit 21 hunting regulations each year and simply complied. But recently it seems we pick up the regs only to learn too late what has already been done to us. We feel our interests are not being carefully considered, so we must get involved. We had hoped that would not be necessary.

We feel it is important for the Board to recognize that the vast, remote Novi River is comprised of three or more hunting areas with distinctly different characteristics. Although we often travel elsewhere on the River, **we ask that you focus for now on the section of the Novi located between the Little Mud River and the Sulukna River, where we do most of our hunting**. Our access methods are a mix of primarily boats, some aircraft, and snow machines for winter travel.

We offer the following information which may assist those of you who, quite understandably, may not have on-the-ground knowledge concerning the complex area we hunt.

1) We seldom see hunters from the villages in the area. This is understandable since the Little Mud starting point is 175 and 140 river miles from Tanana and Ruby respectively. It's far less costly for rural residents to hunt closer to their villages; for example the lower Novi, or the Yuki, Melosi, Koyukuk, etc. which offer moose hunting without the added cost of extra drums of fuel. Recent skyrocketing fuel prices make it even more expensive to get to the area we hunt, regardless of departure point. Fairbanks is 300 river miles, plus 125 road miles distant.

2) Hunting in Unit 21 poses additional problems in low water years. The boat count in our hunting area dropped by half during the most recent low water

hunting season. Many boats fitted with props remained in deeper water downriver, or just didn't come. Jet boats (up to 30% more fuel burn) suffer even more because of high fuel prices and limited ability to pack enough fuel to travel so far afield.

3) Justification for the continuous regulation changes seems to be driven by a scarcity of hard data combined with few, sometimes conflicting anecdotal sources. In the area we hunt, the opportunities, success rates, and bull-to-cow ratios seem to us ordinary folks to be much like they have been for years. The sparse available survey information contains some fluctuations, but the data seems to us to be "Novi-normal" when smoothed and observed over several years. Hunter numbers are down in our area. Some hunters we talk to have mentioned factors such as high fuel cost, confusing and restrictive regulation changes, recent low water challenges, the Fed controlling the river and game, etc.

4) There are obviously several independent variables which impact moose, predator, and hunter numbers in Unit 21. We believe the relatively low number of hunters that have historically frequented our area, combined with our observations of the total context on the ground, supports a loosening, not a tightening of the regs. We believe wolf numbers are down a little in our area and that moose numbers are flat, or up a little. Many of us remember that ten years ago wolves howled morning, noon and night and sightings were frequent. It seems lately that howling and sightings are down. Perhaps Turner and other wolfers are having a positive impact on wolf numbers (positive as in lower). We strongly support effective predator management and control - much more you might guess than hunter control. We are convinced that hunter impacts on moose in our area, when compared to predator-driven moose mortality, are likely puny.

5) A review of Board actions impacting Unit 21 reveals a few concerns related to hunters coming into the Novi headwaters from McGrath via aircraft drop-off, float-hunting by raft, and pickup downriver by aircraft. Most of us seldom encounter these hunters because they are dropped off and picked up many miles above the area we hunt. However, when we do venture upriver it appears the numbers of drop-offs are normal, and we have not encountered problem hunters.

Respectfully we submit the following recommendations:

A. We strongly oppose proposal #47, requiring season reduction and antler restrictions, which was submitted by an outside hunter and would if adopted by the Board, negatively impact our hunting/harvesting experience in Unit 21.

COMMENT# 64

B. We respectfully ask that you return to the simple and effective harvest ticket system, without permits, for our area. We further request that you eliminate the distasteful and disrespectful antler cutting requirement.

We have hunted this area long enough that we are now counting generations. Nothing makes a young family member who bags his or her first bull feel angrier or more disappointed than having to cut the rack, a source of understandable pride to a young hunter/harvester regardless of its measurement. It is especially offensive to hunters of all ages and experience levels to be forced to desecrate the 50-plus rack that occasionally comes with food hunting. We are not trophy hunters; however, many of us see the value of submitting a portion of the lower jawbone if needed for biological study purposes.

C. **Most of us support "meat on bone until processed" for front and hind quarters. Unfortunately the Board didn't stop there, but later added "rib cage."**

For pilots, boaters and their families this imposes expensive transportation inefficiencies in this remote area, including extra trips, and "nowhere to sit" for family members. Overloading is very tempting and safety is jeopardized. The recent attempt to add "the head" to the haul-out requirements was particularly offensive and made no sense. Thanks for deleting it.

D. **We support the proposals which would increase opportunities to reduce predator numbers.**

We appreciate the opportunity to comment and hope that our comments are received as we intend – constructive and respectful of the often thankless service that the Game Board and the Alaska Department of Fish and Game perform for Alaskans.

Nowitna Hunters

Last name	First Name	Address	City	Zip Code
Bergh	Ron	P. O. Box 70587	Fairbanks	99707
Creel	Scott	1210 Pickering Drive	Fairbanks	99709
Dodson	Jim	301 3rd Avenue	Fairbanks	99701

COMMENT# 64

Last name	First Name	Address	City	Zip Code
Harvey	Brenten	1312 Ridgepoint Drive	Fairbanks	99709
Harvey	Shannon	1312 Ridgepoint Drive	Fairbanks	99709
Harvey	Steve	1312 Ridgepoint Drive	Fairbanks	99709
Hoffman	Greg	1182 Crown Road	Fairbanks	99709
Hoffman	Eric	1182 Crown Road	Fairbanks	99709
Karns	Kent	1229 St. Anton Drive	Fairbanks	99712
Karns	Ray	Box 73713	Fairbanks	99707
Karns	Curtis	664 Ridge Loop	North Pole	99705
Kelly	Devin	511 East Slater Dr	Fairbanks	99701
Kelly	James	1080 Tyrol	Fairbanks	99710
Kelly	Mike	1625 Wolverine Lane	Fairbanks	99709
Kelly	Pete	511 East Slater Dr	Fairbanks	99701
Kelly	Robin	511 East Slater Dr	Fairbanks	99701
Maag	Randy	Box 1031	Valdez	99686
Norton	Smokey	5061 Buckingham	Anchorage	99503
Poland	Hess	379 Division Street	Fairbanks	99712

COMMENT# 64

Last name	First Name	Address	City	Zip Code
Price	Kent	813 Columbia Ave	Nyssa OR	97913
Schok	Richard	2350 Watersedge Lane	Fairbanks	99712
Schok	Rick	1103 Park Drive	Fairbanks	99709
Slater	Ron	2045 Bridgewater Drive	Fairbanks	99701
Slater	Shaun	2045 Bridgewater Drive	Fairbanks	99701
Smith	Mike	Box 60661	Fairbanks	99706
Teats	David	412 E. Van Horn Road	Fairbanks	99701
Thies	Howard	416 Slater Drive	Fairbanks	99701
Thies	John Howard	416 Slater Drive	Fairbanks	99701
Thies	Denny	Box 70407	Fairbanks	99707
Weymiller	Jim	2652 17th Avenue	Fairbanks	99709
Wilken	Gary	2600 Riverview Drive	Fairbanks	99709
Wilken	Matthew	3042 Riverview Drive	Fairbanks	99709
Wilken	Bobby	2112 A Street	Juneau	99824

COMMENT# 64

Last name	First Name	Address	City	Zip Code
Wilken	Wayne	10534 Spindrift Circle	Anchorage	99515

COMMENT# 64

Alaska Outdoor Council

PO Box 73902
Fairbanks, AK 99707-3902
(907) 376-2913
aoc@alaska.net
www.alaskaoutdoorcouncil.org

February 15, 2008

ADF&G
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094

Re: Board Of Game Comments, Spring 2008 Meeting - Fairbanks

Dear Chairman Judkins,

Thank you for the opportunity to provide public written comment on behalf of the Alaska Outdoor Council (AOC). AOC is a statewide organization representing hunters, trappers, anglers, and outdoor recreationalists. Currently AOC represents 3,000 individual members and 47 Clubs for a total membership of nearly 10,000 Alaskans.

Continued active predator/prey management to restore ungulate population and harvest objectives in Region III remains our membership's greatest interest regarding Interior proposals. Increased hunting and trapping opportunity, whenever biologically sound, is as important to AOC as is increased habitat non-destructive access to wild game.

AOC remains committed to supporting regulations that provide for healthy wildlife populations that can provide a sustainable harvest of ungulates for human consumption. Equality in access to these public resources among consumptive users should be a primary focus whenever deliberations on allocation proposals are before the board.

AOC comments on Spring 2008 proposals:

- Proposal 1-Amend and Adopt. Amend annual quota to be determined by ADF&G, based on achieving a sustainable harvest of Chisana caribou.

- Proposal 3-**Oppose.** GMU 16B is an IM Area with a bear reduction plan, 5 AAC 92.125(d). Regulations to close black bear hunting within GMU 16B reduces the effectiveness of the Predation Control Area Implementation Plan.

COMMENT# 65

- Proposal 4-**Support.** The current reported harvest of Mulchatna caribou has fallen below the Amount Necessary for Subsistence use (ANS). AS 16.05.258(b)(3)(B) directs the Board to adopt regulations that eliminate nonresident use when harvest levels fall below the ANS in order to provide a reasonable opportunity for subsistence uses. Mature bull caribou have been traditionally harvested for subsistence uses, that leaves the Board no choice other then to reduce the ANS for Mulchatna caribou.

- Proposal 7-**Oppose.** Higher ANS numbers cause exclusion of nonresident hunters whose presence is often economically advantageous to GMU 18 residents.

- Proposal 22- **Support.** This proposal would provide increased opportunity on a growing caribou herd.

- Proposal 25- **Oppose.** ADF&G has documented habitat damage in GMU 20A caused by over browsing.

- Proposal 26- Review ADF&G bull moose population estimates for GMU 20A. If antler restrictions can be relaxed, do so.

- Proposal 37- **Support.** The proposed clarification will assist hunters in understanding and adhering to the area boundaries, thus reducing harvest violations.

- Proposal 38-**Oppose.** The Board of Game should encourage DNR to develop an Enforcement Plan for ORV allowable uses.

- Proposal 41- **Support.** Proposal would remove an unnecessary burden to hunters while generally maintaining the brown bear sealing requirement.

- Proposal 43-**Oppose.** On state lands open to ORV use, a greater distribution of hunters will benefit managers trying to uniformly achieve sustainable harvests within each game population.

- Proposal 49, 59, 62-**Oppose.** If moose population declines adjacent to National Wildlife Refuge lands will not allow for a general harvest adopting regulations to open up more hunting opportunity would be biologically unsound. Nothing in state or federal law allows for a Native hunting priority on Native Corporation lands or Native allotments.

COMMENT# 65

- Proposal 68, 78, 79, 99, 100 - AOC supports liberalized bear harvests as part of a Bear control area Implementation plan. Liberalized bear harvest methods not covered under general hunting regulations should only be adopted as part of a bear control program under 5 AAC 92.125, consistent with the Board's policy on bear management (2006-164-BOG).

- Proposal 70-**Oppose.** Statewide Dall sheep management needs revision. Establishing drawing permit hunts in GMU 25A only increases sheep hunting pressure in areas currently open to general hunting.

- Proposal 71-**Support.** Thanks to the department for bringing this under-harvested game resource to the Board's attention.

- Proposal 73-**Support.** Global warming may be helping to provide more moose browse in 26C. Moose are present in growing numbers and continue to move north. Due to high transportation cost to this remote area, a registration hunt with few participants should assure sustained yield moose harvests.

- Proposal 76, 77, 85- Should be addressed by a BOG Subcommittee on statewide Dall sheep management.

- Proposal 82-**Support.** Liberalization and simplification of trapping regulations should rightfully occur whenever harvestable surplus beaver are available.

- Proposal 84-Defer to a BOG Subcommittee on development of a preference point system for drawing hunts.

- Proposal 86-**Oppose.** Invoking AS 16.05.255(a)(1) to stop hard-rock mining on state owned wildlife habitat open to mineral development doesn't seem necessary for the resource or the State of Alaska. The Board should inquire of the department as to what protection would be afforded to the wintering grounds of the Nelchina caribou herd by prohibiting hard rock mining development activities.

- Proposal 89-**Support.** Increased motorized hunter access into GMU 20A would help achieve the current moose management goals.

COMMENT# 65

- Proposal 94-**Support.** Other than a 10 day December season for bull moose, all other moose hunts in the Koyukuk Controlled Use Area are permit hunts. Allowing the harvest to be spread out off the Koyukuk River would result in a more uniform moose harvest and less crowding along the river.

- Proposal 96-**Support. This proposal would** increase access opportunity to miles of public land in GMU 24A.

- Proposal 97-The Board and department should work with the USFWS to develop a predator/prey management plan in GMU 9 that would apply to both state and federal lands. Implementation of a predator control program on state land will have only limited success due to caribou and moose migration onto federal refuge lands.

- Proposal 102, 106, 113-**Oppose.** Liberalize predator harvest methods in the Intensive Management area instead of terminating the program.

- Proposal 112- **Oppose.** While AOC can sympathize with members of the GASH Advisory Committee, Anti-hunter's intervention through the state court system has stalled implementation of new Predation control area Implementation plan, 5 AAC 92.125. Until the Court makes a ruling on the challenge to the state's current implementation plans the Board should allow the department to continue gathering data required to defend the programs in court, if need me.

Mr. Chairman and Board of Game members, thank you for considering AOC's comments on these regulatory proposals. AOC Board members and staff will be present at the Spring 2008 BOG meeting in Fairbanks to assist in the public process on committees if the opportunity exists.

Rod Arno, Executive Director
Alaska Outdoor Council
FAX: (907) 376-7197

COMMENT# 65

BACKCOUNTRY
HUNTERS
AND
ANGLERS
ALASKA CHAPTER

PO Box 47 Homer, AK 99603
www.alaskabackcountryhunters.org

Alaska Board of Game Comments
Spring 2008 Interior Region Proposals

Proposal 22 — 5 AAC 85.025(a)(15) Hunting seasons and bag limits for caribou.

SUPPORT

There are now enough caribou in the Macomb herd to allow additional harvests and additional hunting opportunity. We see only benefits in the Board passing this proposal put forth by the Department.

Proposal 68 — 5 AAC 92.260 Taking cub bears and female bears with cubs prohibited; and 5 AAC 92.085. Unlawful methods of taking big game, exceptions.

OPPOSE

This proposal is unclear in exactly what "traditional methods" are to be used in the taking of bears. 5 AAC 92.085(6) prohibits the taking of any big game, including bears, "with the use of a trap, or snare." This proposal (it appears) seeks to allow the use of traps and snares to take just black bears, yet there is nothing in the proposal outlining whether neck snares, foot snares, or leghold traps are to be used, what the specifics are on snare wire or trap size, or any specified mandatory time-frame between checking traps and/or snares, and just how the taking of grizzlies will be avoided.

We strongly oppose legalizing the use of snares, traps, and the taking of sows with cubs, and cubs, under a general open season "hunting" scheme in a Unit that already has a very liberalized bear harvest in place. There is currently no closed season for black bears, and up to three bears can be taken annually provided they are not a sow with cubs, or cubs. It is highly doubtful

COMMENT# 66

that this proposal if passed would significantly increase bear harvests and decrease moose calf mortality. AK BHA consistently upholds the position that **any bear control options must have at least a reasonable expectation of achieving the desired goal. And also that they not be done under the premise of "hunting."** While it is possible that a few sows with cubs, or cubs, will be harvested by a few hunters willing to trap, snare, or shoot them, in no way is this likely to significantly decrease future ungulate mortality. And allowing the trapping and snaring of any bear, along with the shooting of sows with cubs, and cubs, as a part of "hunting" is likely to shed a negative light on hunting and hunters among the general public.

Proposal 75 — 5 AAC 84.270. Furbearer trapping; 92.085(6). Unlawful methods of taking big game, exceptions; and 92.990. Definitions (21)

OPPOSE

We appreciate that this proposal clarifies what minimum size cable snares must be used, and the minimum jaw spread of leghold trap. However, this proposal doesn't specify whether or not there would be any mandatory time-frame between checking traps or snares, or how many traps or snares could be set by one individual. Bear leghold traps as were used in the past are incredibly powerful and dangerous and non-selective as to gender or species of bear or other game (wolverine, fox, etc) caught.

There is nothing in this proposal we can see that would prevent the trapping or snaring of female black bears with cubs, or cubs, or grizzly bears. **On that reason alone, unless 5 AAC 92.260 is repealed or waived for these units, we see no way the Board can pass this proposal.**

Mention is made in this proposal of the legalized trapping of black bears in Maine, and that this does not present a conservation concern. However, in Maine a hunter is only allowed to take one black bear per year by any means, whether hunting or trapping, and not three bears as this proposal would allow. Also in Maine a resident must obtain a Maine trapping license and bear trapping permit in order to legally trap a bear, and is required to take a trapping education course. Further, according to Maine regulations, only **one** trap (snare) may be set for bear at any time, and the **only** type of "traps" allowed are the cable foot snare (Aldrich type) and "cage type live trap." According to Maine regulations, these foot-snares or live traps **must** be checked **daily**.

COMMENT# 66

We present this information to show that there is a good reason why there are not bear conservation concerns in Maine where bear "trapping" is allowed, and how their system differs greatly from that proposed here.

Proposal 82 — 5 AAC 84.270(1) Furbearer trapping; 85.060(a)(6) Hunting seasons and bag limits for fur animals; and 92.095(a)(3) Unlawful methods of taking furbearers; exceptions.

Support

Many interior Alaska trappers and residents still utilize beaver as an important food source in late fall and just before and after breakup in spring. Beaver is one of the healthiest and nutritious game meats in Alaska, and we have healthy, abundant populations of beavers that are mostly under-utilized. Liberalizing the methods of take in certain units presents no conservation concerns and simplifying the seasons and bag limits for the entire region just makes good sense.

Proposal 89 — 5 AAC 92.540. Controlled use areas (3)(F)(ii), and
Proposal 90 — 5 AAC 92.540 (3)(F). Controlled Use Areas.

OPPOSE

We strongly oppose Proposal 89 because allowing motorized vehicles to be used during the entire month of September during the hunting season when the ground is still thawed will surely cause damage to fragile habitat and create evermore user conflicts in an area along the border of the WRCUA where we already have growing problems of ATV and ORV abuse.

This proposal or its equivalent has come up at every Interior BOG meeting in the past few cycles and at the March 2006 meeting the Board did not pass a similar proposal (# 147) based in part that some Board members were concerned that motorized vehicles would end up "damaging the country." The Board decided at that time that they would "leave motorized restrictions as is and to see how expanded season meets use objectives."

Two years have now gone by and it is clear that we have widespread access abuse going on along the Rex Trail and outside the WRCUA boundaries

stemming from an increasing influx of motorized hunters. Opening up the WRCUA during September to this influx of hunters would run contrary to past Board opinions and actions and exacerbate the widespread access abuse problems going on in this area that are causing such a storm of controversy and animosity within the hunting community. For the same reasons we also strongly oppose Proposal 90.

Proposal 93 — 5 AAC 92.540(3)(I). Controlled Use Areas

SUPPORT

For many years now since the creation of the Ladue River CUA we have had many hunters completely disregard the access restrictions and go off trail while hunting. There is little Wildlife Troopers can do to enforce the existing regulations because these regulations are not specific enough. By clearly specifying exactly which trails in the CUA allow motorized access, hunters will have crystal clear rules and guidelines, enforcement will be much more straightforward, and the Department will not have to continue to spend monies attempting to define and designate other trails that could legally be used. The intent of the original Ladue River CUA was to keep motorized hunters on Nine-mile, Liberty Creek, and Boundary cutoff trail, and the Alaska-Yukon border, and not to allow expansion of trails and designations of other areas where motorized vehicles could be used. This proposal clarifies that original intent for all and allows enforcement officers to clearly establish when a motorized hunter is breaking the law.

Proposal 100 — 5AAC 92.260. Taking cub bears and female bears with cubs prohibited, and 92.125. Predation control areas implementation plans.

OPPOSE

This proposal seeks to legalize the taking of sows with cubs, and cubs, in **all** intensive management areas of the state, not just Unit 19. This broad scope that would affect so many other GMUs is simply not in the best interests of prudent bear conservation and wildlife management principles.

Proposal 107 — 5AAC 92.125. Predation control areas implementation plans.

OPPOSE

COMMENT#66

Legalizing the snaring of grizzly and black bears and the taking of all sex/age classes of bears in Unit 20E is not likely to result in significantly decreasing bear-caused moose calf mortality. But it is certainly likely to inflame the general public and further skew the perception of hunting and hunters among non-hunters, even though this would be a "control" effort done by permittees and not classified as "hunting" per se.

Based on information coming from the pilot/gunner teams participating in the current aerial wolf control efforts, and biologists at ADFG, the wolf control program in conjunction with the subsequent habitat renewal stemming from the massive 2004 and 2005 wildfires is going to have a positive effect on increasing moose densities. At this time, instituting more bear control methods and means is neither necessary nor advisable.

There are also several unanswered questions regarding legalizing bear trapping in this Unit according to this proposal: How often would the control permittees be required to check bear snares? Every day? Every two days? How many snares would a permittee be allowed to set? Will neck snares or foot snares be used? What size cable? What are the possibilities of bycatch of other animals? Will snares be allowed to be set around bait stations? What is the bag limit? Would the "permittee" be required to possess a trapping license or undergo any type of education course? All these questions and more need to be answered, but the likelihood is that legalizing the trapping of bears along with the shooting of sows with cubs, and cubs, in the Unit 20E control area won't substantially reduce moose calf mortality. What is almost certain is that it would be highly controversial and would cause a backlash against hunting and hunters by the majority of Alaskans who are not hunters.

We have nothing but respect for members of the Upper Tanana/Fortymile Advisory Committee who submitted this proposal, and applaud their willingness to participate in decreasing the bear population in their area in order to increase the moose population. We recognize that a few hunters and trappers from the Tok area would participate in this program and likely take a few more bears if this proposal were to pass. But a few more bears harvested does not necessarily equate to more moose-calf survival. We strongly support the Advisory Committee's idea in this proposal to develop a working group of other advisory committees, hunting orgs, and ADFG in

COMMENT# 66

order to develop protocols and methods and means for carrying out this bear control program and would welcome involvement in such a working group.

Proposal 108 — 5 AAC 92.125. Predation control areas implementation plans.

OPPOSE

We don't believe the Board can legally institute a wolf-control implementation plan when the IM population objective is currently exceeded, and are highly disappointed to see a proposal such as this come from the Fairbanks Advisory Committee.

Proposal 109 — 5 AAC 92.108. Identified big game prey populations and objectives.

OPPOSE

There are currently about 15,000 moose in Unit 20A and recent research done by ADFG biologists points out that we have severe nutritional and reproductive problems with the herd, along with severe habitat/overbrowsing problems when moose are at such high densities in this area. It is highly likely that even 14,000 moose — as this proposal advocates for the newer high end of the IM population objective — is too many moose for this area to support, especially at a time when the habitat needs to recover from overbrowsing. We strongly oppose this proposal.

Proposal 110 — 5AAC 92.125 Predation control areas implementation plans.

OPPOSE

This is a catch 22 problem in that we need to reduce the moose population in Unit 20A that has already exceeded the population objective. Instituting wolf-control in this same region in order to attempt to boost the diminished Delta caribou herd is counter productive to effectively lowering the moose population. This type of situation often arises in areas where we try to manage multiple ungulate species and differing herds. Past wolf control efforts resulted in establishing an extremely high density of moose, along with a high moose/wolf density. Basically, all that moose biomass allows

COMMENT# 66

wolf populations to stay at high densities, even though trappers are able to consistently take 40% of the wolf population annually. This higher density of wolves likely prevents the Delta caribou herd from achieving the IM population objectives.

Contrary to what this proposal states, ADFG and the Board have not "disregarded" IM law and "ignored" this important caribou herd. Much research and monitoring has been done concerning the Delta caribou herd. This is more a matter of not being able to have our cake and eat it too, because the primary concern in Unit 20A is moose, not caribou.

Thank you for the opportunity to comment on these proposals. We wish to also thank the Board of Game members for their service to the state and to all hunters, trappers, and wildlife viewers.

Sincerely,

Mark Richards
Co-chair Alaska Backcountry Hunters and Anglers
alaskabha@starband.net

COMMENT#66

Feb 20, 2008

Alaska Board of Game

Dear Board of Game,

As someone who cares about conservation and science-based wildlife management, I'm writing to express my opinions about some of the proposals the Board of Game will be voting on later this month in Fairbanks.
Please consider my comments when reviewing Proposals 75, 78, 79, and 107, as they will have significant impacts on Alaska's bears. Please uphold Alaska's tradition of ethical hunting by rejecting the following proposals:
* Proposal 75: To allow black bears to be trapped in Units 21 and 24 -- huge areas of the state.
* Proposal 78: To allow black bears (including cubs and sows) to be killed in their dens.
* Proposal 79: To allow the use of spotlights to make it even easier to kill bears.
* Proposal 107: To allow brown and black bears, including cubs and mothers, to be killed using snares and same-day airborne hunting.

These proposals lack any biological justification and fly in the face of decades of tradition where cubs and mother bears have been protected from hunting. Such practices have been generally condemned as unethical hunting and outlawed or traditionally avoided for many years for good reason. We should continue to protect cubs and sows.
And, equally important, I hope you will also OPPOSE:
* Proposals 101 and 104: To extend controversial, unnecessary and costly aerial predator control programs in large parts of Alaska (Units 19A and 19D) for years.

After a thorough review of the programs to date, Defenders of Wildlife has offered competing Proposals -- 102, 106, and 113 -- to discontinue aerial predator control in these areas, and also in Units 20E and 25C, to uphold the will of the people of Alaska who have twice voted to end or severely limit (NOT expand) this practice.
I hope you will acknowledge the Alaskan public's broad opposition to this practice and vote YES on Proposals 102, 106, and 113.
In addition, I support Proposal 74, which was proposed by the Upper Tanana/Fortymile Advisory Committee to reduce the bag limit on lynx (to one) in Unit 12/20E.

The decisions made by the Board of Game have lasting consequences for Alaska's wildlife, wild lands, and the people who, like me, enjoy these wonderful natural resources.
Thank you for your time. I hope you will take my views into consideration as you review these important proposals.

Sincerely,

Mrs. Jessica Robbins
410 7th St Apt A
Fort Richardson, AK 99505-1118

+103 Signatories

COMMENT#67

RECEIVED TIME FEB. 20. 4:35AM PRINT TIME FEB. 20. 4:36AM

I AM IN OPPOSITION TO PROPOSAL #38.

IT IS CLEAR THAT IF PROPOSAL 38 GOES THROUGH THERE WILL BE HIGHER COMPETITION WITH HUNTERS IN AREAS THAT ARE NOT RESTRICTED. THIS WILL CAUSE ALL THE ADVERSE CONDITIONS STATED IN#38 TO INCREASE IN THE OTHER AREAS OF 20A. I HAVE BEEN HUNTING IN THIS AREA OF 20A FOR ALMOST 20 YEARS, RESTRICTING THIS SECTION WILL KEEP OUT 99% OF ALL HUNTERS, BUT ALLOW PEOPLE WITH AIRPLANES TO CONTINUE. THE HUNTERS AND PILOTS THAT USE AIRPLANES, HAVE THE SAME EFFECT ON THE PROBLEMS STATED IN THE ISSUE EXCEPT POSSIBLY THE TRAIL ISSUE.

THANKS,

NELSON GRIER
Nelson Grier

A/C COMMENT # 68