

PC 46

ALLAKAKET TRADITIONAL COUNCIL

P.O. Box 50
Allakaket, AK 99720

1st Chief	Harold David Sr.	Member	Pollock Simon Sr.
2nd Chief	Vincent Bergman	Member	Gordon Bergman
Sec. / Treas.	Derek Simon	Member	Harriet Nollner
		Member	Vincent Simon


Alaska Board of Game
CC: Pollock Simon Jr.

March 1, 2012

The Allakaket Traditional Council has chosen Pollock Simon Jr. (P.J.) to represent the Village of Allakaket and approximately 300 enrolled Tribal Members, during the public testimony on Proposal Numbers 163 and 164. These proposals would drastically affect our Tribal Members and our subsistence lifestyle.

It is really important that our voices be heard; P.J. is an Allakaket Tribal Member and is well aware of all the impacts these proposals would have on our Tribal Members. Thank You for allowing this public testimony on behalf of the Village of Allakaket.

Sincerely,



Derek Simon -- Secretary/Treasurer

RC47

Eastern Interior Alaska Subsistence Regional Advisory Council
c/o U.S. Fish & Wildlife Service
1011 East Tudor Road MS 121
Anchorage, Alaska 99503
Phone: (907) 787-3885, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

March 2, 2012

Mr. Cliff Judkins, Chairman Alaska Board of Game
Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska

Dear Mr. Judkins:

The Eastern Interior Subsistence Regional Advisory Council (Council) met February 29-March 1, 2012 in ~~Juneau~~^{FRIEDLAND}, Alaska. The Council took public testimony and addressed various subsistence related management issues and is supporting Alaska State Board of Game Proposals 227, 228, 229, 230, and 231.

The Council is concerned about the effects of predation by wolves and bears to subsistence use of moose and caribou in these regions. Increased persistence of predators in these units is a problem that needs to be resolved. Initiating predator control measures would be helpful to boost wildlife populations in these areas. Without these predator control measures, resource managers may not have all of the tools necessary to address impacts on moose and caribou by predation. As a result, there will increasingly be fewer moose and caribou available for harvest by subsistence users in the region.

Thank you for the opportunity for this Council to assist the Department to meet its charge of protecting the resources and the opportunity to comment on the Departments proposals. We look forward for continuing discussions about the issues and concerns of subsistence users of the Eastern Interior Region. If you have questions about this correspondence, please contact me via Melinda Hernandez, Regional Council Coordinator, with the Office of Subsistence Management at 1-800-478-1456 or (907) 786-3885.

RC 48

Western Interior Alaska Subsistence Regional Advisory Council
c/o U.S. Fish & Wildlife Service
1011 East Tudor Road MS 121
Anchorage, Alaska 99503
Phone: (907) 787-3888, Fax: (907) 786-3898
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March 2, 2012

Mr. Cliff Judkins, Chairman Alaska Board of Game
Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska

Dear Mr. Judkins:

The Western Interior Subsistence Regional Advisory Council (Council) met on February 29, 2012 in McGrath, Alaska. The Council took public testimony and addressed various subsistence related management issues and addressed Alaska State Board of Game Proposals 141, 151, 153, 154, 155, 156, 157, 160, 162, 163, 164, 167, 168, 169, 179, and 184.

Proposal 141-Oppose

Black Bear and Grizzly are revered and respected culturally, and to not be sold or abused. There would also be sows with low-grade fur, as well as cubs that would have little value that would be destroyed. Incidental by-catch of Brown Bears, as well as aggression of trapped bears is a serious concern regarding trapping.

Proposal 151-Oppose

The Council feels the Kanuti, Koyukuk, and Paradise Controlled Use Areas are accomplishing their original intent. These areas allow compatible user groups to harvest with reduced conflict, as well as maintaining sustained yield management.

Proposal 153-Support

The current method of permit issuance is beneficial to maintain populations within sustainability. A Tier II permit system would be even more restrictive.

Proposal 154-Support

The Council is in favor of maintaining antlerless moose hunts. The McGrath local advisory committee is also in support of this proposal.

84 39

Proposal 155-Oppose

The Council does not see any need for reduction. The harvest of these small herds is very low and not a threat to the bull: cow ratios as in other areas.

Proposal 156-Oppose

The harvest is low enough to maintain healthy bull: cow ratios at this time.

Proposal 157-Support

With the caveat that: the IM plan needs to have a management objective for bull caribou that is recognized in the literature as 35: 100 Cows. The IM plan for 20: 100 for the Mulchatna herd is completely inadequate as stated.

Proposal 160: Support

The Lynx resource is underutilized in GMU 19 and can well support harvest in conjunction with wolf and wolverine trapping. The fur is quality is better earlier in the winter.

Proposal 162-Oppose

Passing of this proposal could jeopardize the CUA and the success of the Koyukuk Moose Management Plan. The current Koyukuk CUA is working as a management tool to sustain the moose population, and reduce user conflicts. Current bull: cow ratios are right at objective.

Proposal 163: Support

The Council feels there is a need to increase local harvest of moose for Allakaket and Alatna. The moose population is low and far below its carrying capacity.

Proposal 164- Oppose

There are 2 air taxi operations in Bettles and there are 2 air taxi operations working from the Dalton highway. Both are very close proximity to the Kamuti CUA. There would be a large increase in hunters using private aircraft also. The Kamuti CUA is working to its original intent: sustaining the moose population in an area that is vulnerable to high air access use, and reduced user conflicts.

Proposal 167-Support

Few local people will take a wolf that late in the spring, but the wolf population is harvested well below sustained yield in GMU's 21 and 24.

Proposal 168- vote to Defer

Proposal 169-Oppose

Proposal 179: Support

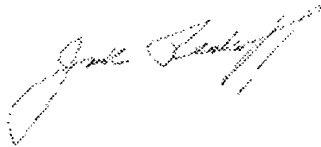
There is growing sheep hunting pressure from residents accessing from the Dalton Highway. The very recent addition of guided nonresident participation in and near the DHCMA for Dall sheep is taking almost all the available legal rams. The sheep population is at an all-time low and can little support unlimited re-allocation to non-resident use.

Proposal 184: Oppose

There is already excessive harvest of Dall sheep. The proposal is vague and does not delineate if all big game would be harvested with use of crossbow. Use of a crossbow will also attract more novice hunters because of the technologic advancement. The low-density populations of moose and sheep need methods and means management that is sustainable in the DHCMA.

Thank you for the opportunity for this Council to assist the Department to meet its charge of protecting the resources and the opportunity to comment on the Departments proposals. We look forward for continuing discussions about the issues and concerns of subsistence users of the Western Interior Region. If you have questions about this correspondence, please contact me via Melinda Hernandez, Regional Council Coordinator, with the Office of Subsistence Management at 1-800-478-1456 or (907) 786-3885.

Sincerely,



Jack Reakoff, Chair
Western Interior Subsistence Regional Advisory Council

cc: Peter Probasco, ARD
Geoff Haskett, Regional Director, Region 7
Federal Subsistence Board Members
Western Interior RAC



**THE HUMANE SOCIETY
OF THE UNITED STATES**

March 2, 2012

Via Fax and First Class Mail

Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
FAX: (907) 465-6094

Re: Bear Trapping and Baiting Proposals

Dear Alaska Board of Game Members:

On behalf of our nearly 21,400 constituents in Alaska, The Humane Society of the United States (HSUS) submits the following comments regarding proposals to expand the trapping of black bears in Alaska with elevated bucket foot snares. Proposals by the Alaska Department of Fish and Game and others would allow the trapping of cubs and sows with cubs, allow the use of artificial lights, allow same-day-airborne shooting, set no bag limit per trapper, and set no limit on the number of traps that could be used, which all may be permitted year-round. Other proposals would expand the baiting and aerial killing of brown and black bears and allow helicopter access to certain trapping areas. The HSUS urges you to reject such proposals to expand the inhumane and unwarranted trapping and baiting of bears in Alaska for the following reasons.

The Public Trust

The North American wildlife conservation model sets limits through restricting activities as a means of protecting wildlife. According to the U.S. Fish and Wildlife Service (USFWS), wildlife watchers alone outnumber hunters by more than five to one in the nation and also contribute nearly twice as much to the economy. In Alaska, wildlife watchers outnumber hunters by three to one and outspend them by more than four to one. It is important that hunters carefully consider their actions in context of the general public's perception of their activities. The general public will not tolerate hunting viewed as unfair, unsporting or inhumane. All Alaska residents have a stake in the proper conservation and management of Alaska's wildlife. As hunters impose issues that the general public does not support, such as the use of indiscriminate traps on bears, the killing of cubs or sows with cubs, the orphaning of young, the use of aircraft for hunting bears and the use of devices or techniques that give the hunter an overly unfair advantage, the public's opinion of all hunters is challenged.

The Northeast Wildlife Damage Management Research and Outreach Cooperative accurately states that "Black bears are a public trust resource in the United States. They are held in trust by the state and are managed by wildlife agencies for the benefit of all citizens. Decisions about bear management are an

expression of public policy and, in general terms, bear management issues are actually public policy issues."

Trapping: Unsporting and Inhumane

Proposals to expand bear trapping, such as Proposal 231, 197, and particularly Proposal 141 by Alaska Department of Fish and Game (ADFG) would allow the use of methods such as snaring, artificial light, same-day-airborne killing of bears, and the trapping and killing of cubs and sows with cubs that the general public, including hunters and non-hunters alike, view as unsporting and unethical.

Proposal 141 would greatly expand the use of bucket foot snares for trapping black bears. When a bear reaches into a bucket foot snare to reach the bait inside, a metal snare clamps down around the animal's foot and tightens as the bear struggles to escape. Animals may suffer severe injuries in the frantic attempt to escape the snare. Trapped bears may languish for hours or days before the trapper finally arrives to kill the animal. Since Proposal 141 would only require traps to be checked once every two days, legally this measure could leave bears struggling in snares for up to 48 hours. Considering enforcement difficulties presented by such a requirement, in reality bears could suffer for much longer.

Snaring is not only cruel but also indiscriminate, capturing any bear that reaches into the bucket for bait, including cubs, sows with cubs, or brown bears. For this reason, the ADFG proposal would legalize the trapping and killing of black bear cubs and sows with cubs, which will likely result in the orphaning and slow death of bear cubs.

Baiting: an Unfair Chase:

Alaska should also reject as unsporting several proposals to expand bear baiting, such as Proposal 144 (to allow for same-day airborne hunting for black bear over bait in the Interior region) and Proposal 236 (to allow harvest of brown bears at bait stations in three units) by the Fairbanks Advisory Committee, Proposal 196 (to allow brown bear baiting with same season restrictions as black bear baiting) by Upper Tanana Forty-mile Advisory Committee, and Proposal 168 (to allow brown bears to be harvested with bait in Unit 21D) by Middle Yukon Advisory Committee.

Bear baiting is generally considered unsporting including by many hunters, because it lacks the element of a fair chase. The baiting of bears for the purpose of hunting conditions them to food obtained from humans. These bears are likely to become so-called "problem" bears, something which this hunt is purportedly designed to reduce.

In a letter to the U.S. Fish and Wildlife Service, the director of the Pacific Northwest Region of the National Park Service stated his opposition to baiting on national forest lands abutting Crater Lake National Park. The director wrote, "Biologically, there is no difference between a bait station and a dump. Bait stations habituate bears to human-generated food, contributing to the potential for conflicts between bears and people in the park." Tom Beck, a hunter and a bear biologist with the Colorado Division of Wildlife, shares a similar opinion. "I firmly believe that baiting creates 'nuisance' bears," he says. "Black bears are naturally wary, instinctively avoiding close contact with humans. But large amounts of tasty food, easily obtained, defeats this wariness. By baiting, we create lazy bears who have been rewarded, not punished, for overcoming their fear of humans."

The use of bait in the hunting of bears is prohibited in forty states, and the practice should not be expanded in Alaska. Many states kill a high number of bears and do not resort to the use of bait. Over

the past several years, upwards of 1,800 bears were killed in California, 1,000 in New York, 1,000 in North Carolina, 4,000 in Pennsylvania, and 1,000 in Washington in a given year.

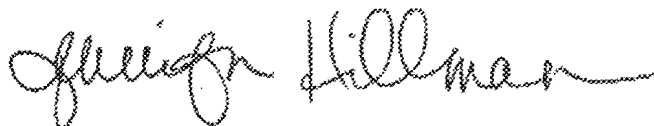
Conclusion

In addition to the trapping and baiting proposals above, The HSUS opposes other pending proposals to manage bears in ways that are inconsistent with standards of fair chase and humane animal treatment, such as Proposal 109 by the Greater Alaska Bear Committee, which would set no closed season on black bears, allowing bears to be killed when they are in dens or caring for cubs, and Proposal 131 by Alaska Department of Fish and Game which would allow the aerial killing of black and brown bears of any age in Unit 19A.

The Humane Society of the United States respectfully urges you to reject proposals to expand bear baiting and bear snaring. Further, we hope that the Board of Game will end the experimental use of snares to capture bears in Unit 16 currently and reverse its decision to allow bear snaring in Unit 19D beginning June 30.

Thank you for the opportunity to comment.

Sincerely,



Jennifer Hillman
Western Regional Director

¹ U.S. Fish and Wildlife Service, "National Survey of Fishing, Hunting and Wildlife-Associated Recreation," 2006.

² William F. Siemer, Daniel J. Decker, Peter Otto, Meredith L. Gore, Northeast Wildlife Damage Management Research and Outreach Cooperative, "A Practitioner's Guide: Working through black bear management issues," 2007, p. 5.

**ALASKA BOWHUNTING ASSOCIATION and KEN VORISEK'S
TESTIMONIES—3/3/12**

Proposal 44, Apply Discretionary permit conditions to Governor's Tags.

SUPPORT. For the reasons the Department outlined in the proposal.

Proposal 46, 47, Purchase and sale of game trophies.

SUPPORT. For the reasons outlined in the two proposals.

Proposal 109. Seeks to clarify or remove complicated and overly restrictive bear baiting regulations, and to remove "Discretionary Provisions" from baiting.

SUPPORT----if amended to include South East Alaska in the removal of the "Discretionary Provisions".

The sponsor of this proposal noted that South East has unique issues, those unique issues are harvest quota related, and not bear baiting related. Bear baiting issues in S.E. are the same as the State wide issues. Complicated bear baiting regulations implemented by "Discretionary Provisions" are not unique to S.E.

92.044 by regulation are the conditions governing bear baiting. Some years ago 92.052 the "Discretionary Permit Hunt Conditions" were added to the bear baiting regulations. This has lead to subjective and inconsistent baiting regulations State wide. 92.052 was meant to apply to "Drawing" and "Registrations" hunts, not "General Season" hunts such as black bear hunting, or, "Means Of Take" such as bear baiting.

We ask the Board of Game to remove 92.052 "Discretionary Conditions" from bear baiting State wide. And place all necessary bear baiting regulations in 92.044.

As a housekeeping measure, we request that the Board of Game direct the Department to remove the language "contaminated soil", as a bear baiting condition from the "Annual Regulation Booklet". 92.044 says "BAIT, LITTER AND EQUIPMENT MUST BE REMOVED FROM THE BAIT STATION"..... It does not say soil, contaminated or otherwise. It is simply not a requirement of the regulation to remove soil. This has been brought to the Departments attention numerous times and it still remains in the booklet.

Proposal 119, Seeks to clarify and document bear baiting regulations.

SUPPORT. We believe that there should be an appropriate place in the Administrative Code for all regulations passed by the Board of Game, so those regulations may be documented and available to the public.

Proposal 144, Would allow Same Day Airborne while bear baiting.

SUPPORT. For the reasons outlined in the proposals.

Proposal 184, Would allow Cross Bows in the Dalton Hwy Management area.

OPPOSE. Because Cross Bows are a fundamentally different weapon then Bows and Arrows and we do not support there use in archery areas or seasons.

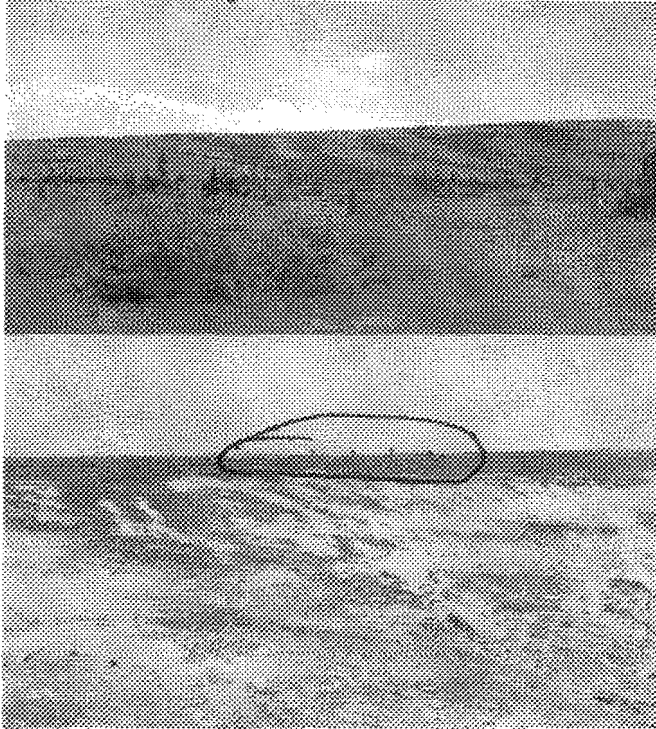
Proposal 224, Would change the Fairbanks Management Area Boundaries.

OPPOSE. The proposal does not included a boundary description. Without a boundary description it is impossible for the public to assess and comment on the impact of the proposal.

Lastly, there are a number of proposals that allow for baiting grizzly bear. We support those proposals in Units where the Department needs to increase the current harvest.

OLD DM766 ↓

NEW 2011 DM766 →

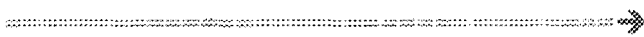


6 Bulls Crossing Ridge^



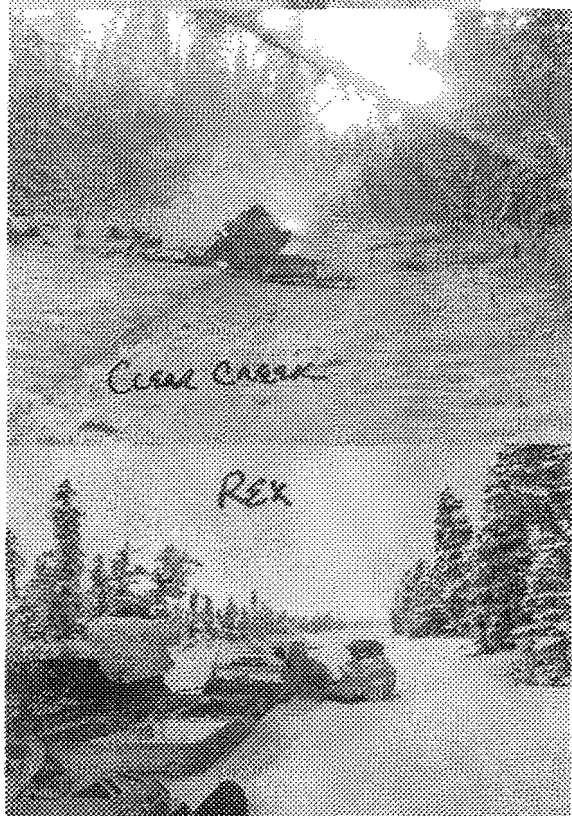
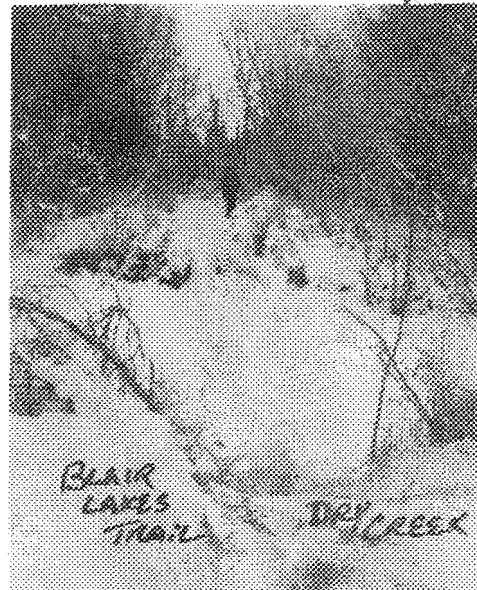
↑ OLD DM766 ↓

STILL UNABLE TO CROSS TANANA 11/24/11 →



PROPOSAL 2077-208
SUPPORT
DAVE MACHACIA
3/2/2012

RC51



OPEN TANANA
24 NOV 2011

NEW DM 766

VASTLY DIFFERENT AREA'S

December 1, 2011

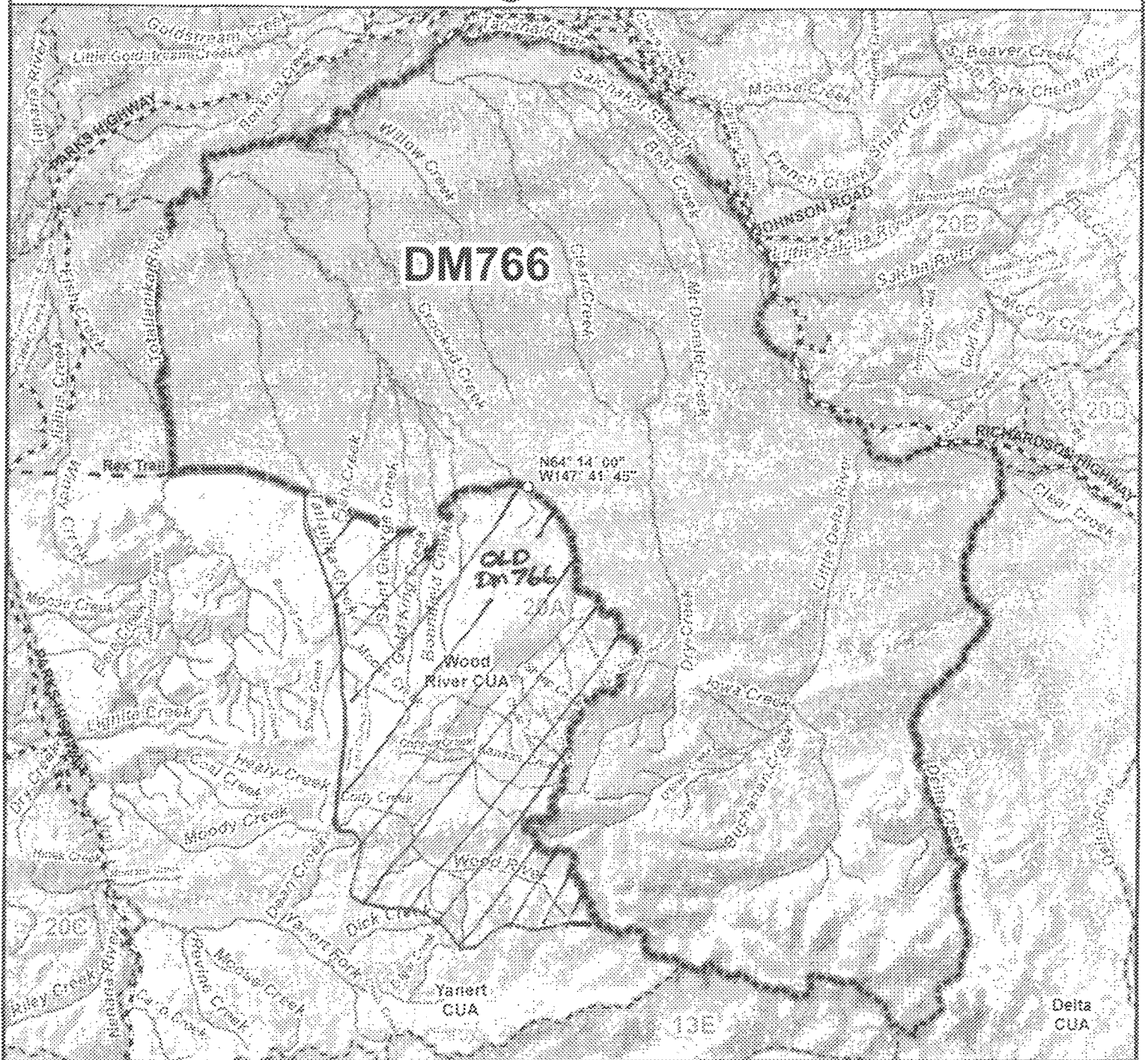
NOVEMBER ACCESSIBLE

DM766

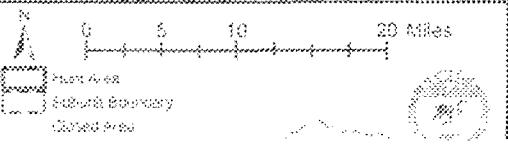
OLD DM766

Moose

Drawing Permit Hunt



AREA DESCRIPTION: Unit 20A, that portion bounded by a line beginning at the intersection of the south side of the Rex Trail and the east bank of the Totatlanika River, then east along the south side of the Rex Trail to its intersection with the Wood River's east bank (N64° 14' 00, W147° 41' 45), then south along the eastern boundary of the Wood River Controlled Use Area to the eastern boundary of the Yanert Controlled Use Area, then east along the eastern boundary of the Yanert Controlled Use Area to the Alaska Range divide, the Alaska Range divide to the headwaters of Delta Creek, then north along the Creek to the Tanana River, then west along the north bank of the Tanana Riv of the Totatlanika River, then south along the east bank of the Totatlanika F origin



NOTE: November 2011 Temperatures were extreme, allowing some additional access late in the Month beyond the yellow highlighted area. This access is normally not a option during November.

ADFG Web Page "Hunt Maps"

I SUPPORT PROPOSAL 207, AND WOULD PREFER THE BOG DIRECT THE DEPARTMENT TO HOLD THE HUNT IN ITS ORIGINAL HUNT LOCATION OR CHANGE THE REGULATION TO LIMIT THE HUNT TO THAT LOCATION.

Signature Print City

Ben MacEachern Ben MacEachern FBKS

~~Matthew Redwood~~ Matthew Redwood FBKS

Denis Valsinis Denis Valsinis NP

John Handberg John Handberg FKS

Michael ... Michael ... FKS

Michael ... Michael ... NP

Kevin Drange Kevin Drange FBKS

John Harrell John Harrell NP

Troy Jackovitch Troy Jackovitch FBKS

Rick Thompson Rick Thompson FBKS

Greg Alexander Greg Alexander FBKS

Deborah ... Deborah ... NP

Lucas Smith Lucas Smith N.S.

Ron ... Ron ... NP

AL BRAVO AL BRAVO FAIRBANKS

Michelle Drange Michelle Drange FAIRBANKS

Taylor Williams Taylor Williams Fairbanks

Alicia Madroak Alicia Madroak Fairbanks

Dallas Meag Dallas Meag Fairbanks

Bruce L. Davids Bruce L. Davids FBKS

Marty A. Schatz Marty A. Schatz N. Pole

Patty Drange Patty Drange Fairbanks

Michael P. Bainman Michael P. Bainman Fairbanks

**Stony Holitna Advisory Committee
Comments on Proposals
Alaska Board of Game Region III Meeting
Spring, 2012**

Excerpt from Dec 19 meeting

SHAC members were most vocal in support of Proposals 131, 141 & 157, and in opposition to Proposals 142, 145, 147, 148, 150, 151, 153, 155

Deferred Proposal 131 – Support unanimously - Add bear population reduction to GMU 19A predation control program.

- The Holitna River drainage, (the largest, most prolific tributary of the Kuskokwim drainage), is known for its habitat and was known for the large moose stocks it produced.
- 1992-2004 – No predator control allowed in GMU 19A, reducing moose to **“No harvestable surplus” status** in the upriver, eastern portion.
- 2005 - Aerial predator management for wolves started in 19A & still in effect.
- 2006 – To help rebuild the moose populations in GMU 19A - The 4 dissenting villages of 11 Central Kuskokwim AC villages made a proposal to close the moose season in the eastern portion of GMU 19A - adopted by BOG, and remains closed.
- 2007 – Stony Holitna AC (SHAC) was created to represent the 4 upriver villages of the CKAC.
- Moose numbers are rising - but slowly. **Calf survival rate through the summers is low**. There is little doubt that bear predation is the major factor there.
- No more studies are needed - There are several models available to the Division of Wildlife Conservation... The Bear Control Area in GMU 19D is similar to the proposed Bear Control Area in 19A within the present 19A aerial predator management area for wolves.
- **Proposal 131** adds bear reduction to the existing predation control program in GMU 19A
- SHAC strongly supports all points made and methods listed, especially the use of helicopters by ADF&G personnel.

Proposal 140 – Support unanimously for reasons given in proposal.

Proposal 141 – Support unanimously - Black bear trapping requirements - affecting GMUs 12, 16B, 19A & D, 20E, 25B

SHAC supports the proposed seasons and restrictions/requirements for trapping black bear- as they are listed.

Proposal 142 – Oppose - by The Alaska Center for the Environment to prohibit trapping black bear.

In the 2nd paragraph under **“Issue.”** it says snaring is not the best & highest use of the resource, and then intimates that wildlife viewing is. SHAC agrees with the state constitution - that the best and highest use of the resource occurs when predator/prey populations are managed for maximum consumable harvest **by humans.**

Proposal 143 – Support unanimously. Baiting of bears is a completely different method from other big game hunting, and flying the same day does not give hunters an unfair advantage over not flying the same day.

Proposal 144 – Support unanimously for the same reasons in proposal 143.

Proposal 145 – Oppose unanimously. This is nothing but another ploy to obstruct predator management, lacking any genuine concern for the well being of subsistence users. The reason of relying on wolf pelts for subsistence is a thin one compared to the subsistence need for ungulates.

Proposal 146 – Support unanimously. These predators are prolific and can survive anywhere. They disturb the balance between the indigenous game populations.

Proposal 147 – Oppose unanimously. SHAC would support this with amendment “For black bears only.” This would allow those using helicopters to access any area, and intrude on established trap lines.

Proposal 148 – Oppose unanimously. This is Science NOT at its worst, and is disingenuous in its reasoning.

Proposal 150 – Oppose unanimously for the same reasons as proposal 148

Proposal 151 – Oppose - Review Conditions for Controlled Use Areas in Region 3 –

This proposal mentions having the local ACs give input on CUAs.

SHAC and CKAC have made their positions known on CUAs in 19 A&B. This has also occurred at BOG meetings when attempts have been made to repeal some CUAs.

Some CUAs came into being after long battles by locals to get them into regulation. While existence of some CUAs may not be as critical as they were in past years, due to the closure of a specie, they will be just as effective and needed when that specie can again be hunted. SHAC believes this should be done at the GMU and GMU subunit level, rather than Region-wide.

Proposal 152 – Support unanimously. This will encourage young folks to spend time in the forest and familiarize them with weapons, giving them self confidence in their use.

Proposal 153 – Oppose - Eliminate requirement to pick up moose registration permits prior to the season in remote villages.

Biologists are trying to manage animals. Adopting this proposal would deprive them of discretionary authority, and destroy one of the only tools available to limit hunting pressure - short of Tier II.

Presently managing these hunts as they do, ADF&G limits –

- the number of permits where harvest pressure could exceed the sustainable harvest.
- permit availability to keep hunting pressure and overharvest risk down.
- Often put a cap on the number of animals harvested.

In Unit 19D, near McGrath, this policy has been very effective, where they have been able to manage moose harvest as precisely as possible – taking the harvestable surplus, and no more.

SHAC villages chose a closure rather than Tier II in eastern 19A, and when moose stocks increase enough, this sort of registration hunt is what we hope to start out with.

Proposal 154 – Support unanimously for the reasons given by ADF&G

Proposal 155 –Oppose unanimously. These herds are rarely hunted by residents due to the remoteness of their range. Some of the decrease in these herds has been due to their joining the Mulchatna Herd when it grew so large, expanded its range, and altered its migration patterns. There are other herds further west and south that have shrunk or disappeared altogether for this reason.

Also the Mulchatna herd has shrunk drastically, but not due to human hunting pressure. The decrease was due largely to large cohorts born in the mid 90s dying off naturally after 12 to 15 years.

Proposal 156 - Oppose unanimously for the same reasons given in proposal 155 comment.

Proposal 157 – Support unanimously – Include GMUs 19A&B in the Mulchatna Caribou Herd Predation Management Plan.

SHAC would like to see this predation management plan expanded into GMUs 19A & 19B. There are calving grounds, especially in 19B, near and between the tributaries of the Holitna Drainage. The proposal lists all the reasons in detail.

Proposal 160 – Support unanimously for reasons given in proposal.

RC53

INTERIOR REGION SHEEP PROPOSAL COMMENTS 2012

BY

Wayne E. Heimer
1098 Chena Pump Road
Fairbanks, Alaska 99709

I am speaking for myself as a Dall sheep biologist (still) and Dall sheep manager (formerly) on all these proposals. I am also speaking for the Wild Sheep Foundation on several specific proposals. I shall identify these. I oppose Proposals 134, 135, 136, 137, 138, 139, 178, 179, 188, 189, 190, and 214.

These proposals deal primarily with Dall sheep hunting, and if implemented will generally change the management plans for Dall sheep in Interior Alaska. I have no real problem with changing management plans if the managers and public are involved in an open process. However, making radical changes to management objectives for Dall sheep on the basis of individual proposals to favor one special interest above another seems to mock the planned management system.

We recently dealt with these similar proposals to advantage resident or nonresident hunters, establish permit systems, etc. at the Statewide level. In those analyses, we showed there was neither an opportunity limit nor a harvest constraint which rose to the level necessary to justify broad-scale management changes. Those proposals were not accepted at the statewide level, and I suggest the Board reject proposals 134, 135, 136, 137, 138, 139, 178, 179, 188, 189, 190, and 214 using the same rationale, plus the recognition that changes in Regional or Area management plans should be judiciously done after carefully considered all the ramifications of these changes. This level of review and public input cannot be adequately achieved via public testimony before the Board, and simple Board deliberations do not allow for the necessary exchanges between the Board, the Department, and the public before changing existing rationally-derived management plans. Below I offer some specific comments.

Proposals 134, 135, 138, 139, 179, 189, and 190 would unnecessarily restrict nonresident Dall sheep hunting, provide no definable benefit to residents, and limit economic benefit from nonresident revenues generated by the Interior Region Dall sheep populations. Additionally, they would unnecessarily complicate Dall sheep management without adequate public input or a reason to so. With respect to these proposals, I speak for the Wild Sheep Foundation in opposing this proposal.

Proposal 136 makes no better sense for Region III than it did statewide. The arguments are the same. I speak for the Wild Sheep Foundation in opposing this proposal.

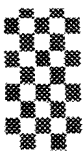
Proposal 137 is a complex system designed to unnecessarily limit nonresident hunters, and lower a harvest that is biologically irrelevant and cannot be calculated unless data which debunked the folklore surrounding nonresident hunting are used. These data justified rejection

of this sort of idea at the Statewide level, and should do the same here. I speak for the Wild Sheep Foundation in opposing this proposal.

Proposal 178 revisits the previous issue of exclusive local resident hunting on Red Sheep and Cane Creeks. I was the ADF&G sheep biologist when local residents first claimed non-local hunting for full curl rams was ruining subsistence hunting and the sheep populations. Looking at what has happened with regulations and populations in these areas all these years later shows those claims were not correct then. I doubt they are biologically correct today. Recent analyses of open full-curl ram hunting data from the last 20 years of Dall sheep hunting in Alaska have shown no changes in age structures of rams. If there were a biological effect compromising or lowering the sheep populations here, it would be more likely due to the either-sex three-sheep bag limit during the seven-month subsistence season than to hunting of full curl rams only by non-local users during 42 days in the fall. Red Sheep and Cane Creek represent Dall sheep habitats which may rationally be considered less than ideal because of their geography-influenced weather. If there are areas where harvest of ewe sheep should ever be considered most carefully, this area should be among them. Conservative hunting for rams is the best management approach for the sheep populations of this area. I urge rejection of this proposal on biological grounds. If there is a reason to accept it, that reason is simple preference for local users alleging an undocumented need and subsequent use. This is not a matter of biology for cultural survival, despite the biological data presented and the accompanying social allegations. I speak for myself as a Dall sheep biologist and experienced observer of the "Red Sheep saga" on this proposal. I do not represent the Wild Sheep Foundation here.

Proposal 188 represents a traditional effort by special interests (in this case guiding) to secure an advantage over others. This is not economically significant to the state because the number of nonresident licenses sold will be small. There is no reason to do this except to benefit the guides involved. Relatively recently, the number of permits in the TMA was increased. Hence, the necessity for increased nonresident opportunity seems unwarranted in this circumstance. Here, I speak from my experience as a creator of the Tok Management Area and an experienced Dall sheep manager. I do not represent the Wild Sheep Foundation here.

Proposal 214 is premature. While the allegation that some rams never reach full curl regardless of age seems empirically correct, design of a harvest system to allow or culture the harvest of these rams is more complex than allowed for in this proposal. There is no mechanism to identify these "culls," or facilitate their harvest; and the suggestion that such a complex and unproven harvest strategy ". . . would diversify the harvest among the various age structures in the rams groups and may positively affect breeding dynamics," is inconsistent with the data on age structures from both hunted and unhunted populations. It also fails to appreciate the dominance behavior of Dall rams in rut. There may be a time for this sort of approach, but we're not yet approaching the level of detailed knowledge necessary for this proposal to be more than an unnecessary complication of the harvest regulations. The benefits would be very small, the risks undefined, and the biology we do understand ignored. Hence, I argue this is not a good approach at this time. I speak for myself as a Dall sheep biologist and experienced Dall sheep manager regarding this proposal. I do not represent the Wild Sheep Foundation here.



McGrath
Fish and Game Advisory Committee

RC 54

Ray Collins
Chairman
PO Box 75
McGrath, AK 99627

February 17, 2012

Members of the Board of Game,

The McGrath AC would like to request that the Board of Game take no action on any sheep proposals involving 19C.

Our reasoning is detailed here. There is that there is a documented history of Dall sheep harvest and use by residents of Upper Kuskokwim River communities including the community of Nikolai. The Alaska Board of Game has recognized this use with a positive customary and traditional use finding for Dall sheep in 19C.

At the Spring 2010 Interior BOG, Proposal 82 requested a winter Dall sheep hunting season in this subunit. It was submitted because the current fall season for hunting Dall sheep does not allow for customary and traditional sheep hunting patterns. Specifically, Dall sheep habitat in 19C is virtually inaccessible from Nikolai during open water months without use of expensive, specially equipped boats or aircraft, and these modes of access are not currently feasible for Nikolai residents.

The McGrath AC plans to resubmit a similar proposal for the 2013-2014 BOG cycle after new quantitative and qualitative data collected by the ADF&G Division of Subsistence in Nikolai in January 2012 is available. At that time, the McGrath AC will be able to better address issues with the proposal raised by the BOG at the 2010 meeting.

The McGrath AC requests that the BOG take no action on any Dall sheep proposals involving 19C until this new information is available, due to concerns about the Board of Game providing Upper Kuskokwim area residents with a reasonable opportunity for subsistence in the future.

Thank you for your time and consideration on this matter.

Ray Collins

Ref: David James Presentation
Region 8 budget & Mill, of this
5.2 Mill comes from Pittman Robertson Funds

RC55

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Don't starve our game managers: Nonresidents cover research and management costs

by Vegi Umphenour
Jan 08, 2012 | 1297 views | 7 09 | s | | |

Community perspective

The current discourse about resident and non-resident hunters, and who should have priority, needs to be looked at objectively. In a majority of cases, the nonresident hunter is associated with the Alaska guiding industry, so I will address that aspect.

The guiding industry, like the commercial fishing industry, is an important economic entity for the state. Professional guide personnel, transporters, sporting goods stores, aviation entities, game processors, food banks, taxidermists, wildlife managers, etc., all prosper from the nonresident hunting and guiding industry.

To summarily argue that Alaska residents should have priority in harvesting game is short-sighted.

An Alaska resident pays \$25 for a hunting license and can harvest moose, caribou, sheep, goat, black bear, and grizzly bear. This is all for a mere \$25 license --- the Alaska resident pays no tag fees to hunt the state's big game animals (the exceptions are musk ox and brown bear).

Alaska is the only state west of the Mississippi that has this policy.

So who foots the bill for wildlife management?

The majority of the state's own dollars spent on hunting management budget come from the sale of hunting licenses and tags. Now remember that residents do not pay tag fees.

The state uses this money to match federal dollars. In the 1930s, the U.S. Congress passed the Pittman-Robertson Act. This bill placed a tax on all ammunition, guns, archery equipment, etc. The money from this federal tax matches three dollars for every one dollar that the state collects for licenses and tags.

For example, A non-resident sheep hunter pays \$85 for a license and \$425 for a sheep tag. This totals \$510.

The Pittman-Robertson money from the federal government match is three times \$510, or \$1,530.

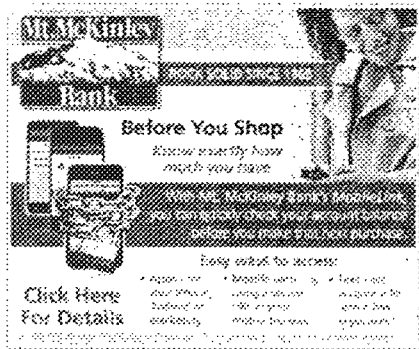
Hence, \$1,530 plus \$510 is \$2,040 flowing into the state's coffers for wildlife management programs.

If this same out-of-state hunter also buys a moose tag (\$425), wolverine tag (\$175), caribou tag (\$325), wolf tag (\$30), the match grows larger.

In each case, the moose tag brings the state \$1,700, the wolverine brings \$700, the caribou brings \$1,300 and the wolf brings \$120.

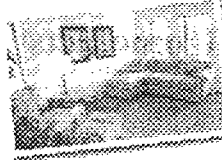
Add all that up, with the sheep tag and license, and it comes to \$5,860.

This is one heck of a deal, and it funds a substantial percentage of our wildlife management program.



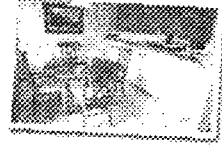
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DRAFT

PROPOSAL XX SAAC 92.011. Taking of game by proxy. Limit the abuse of the proxy hunting regulation.

...

(d) A person may not be a proxy

(1) for more than one beneficiary at a time;

(2) more than once per season per species in Unit 13;

(3) for Tier II Caribou in Unit 13, unless the proxy is a Tier II permittee.

(4) more than once per regulatory year for moose in Units 20A and 20B

...

ISSUE: Some individuals are harvesting multiple moose during antlerless moose registration hunts. This may lead to localized overharvest of female moose in some areas. Also at issue is allocation of the resource and fair and equitable distribution of the meat.

WHAT WILL HAPPEN IF NOTHING IS DONE? Fairness issue will continue to divide hunters resulting in deterioration of public support for antlerless hunts. Localized overharvest may also contribute to user conflicts and loss of support for antlerless hunts.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? The distribution of the harvest will be viewed as more fair and equitable.

WHO IS LIKELY TO BENEFIT? Those that participate in the antlerless hunts.

WHO IS LIKELY TO SUFFER? No one.

OTHER SOLUTIONS CONSIDERED? Prohibit taking of moose by proxy; limit 1 proxy per household.

PROPOSED BY: Fairbanks AC (HQ-08S-G-)

Intra-departmental Coordination (other area offices, Subsistence, Habitat, etc.):

Inter-departmental Coordination (Wildlife Troopers, federal agencies, etc.):

Remove Bonifield Creek and Gold King Creek from the proposal 210.

Open the drainages of Fish Creek, St. George Creek, and all the drainages of Tatlinka Creek to motorized vehicle access.

St. George Creek is a narrow drainage with steep walls that are too steep to be climbed by vehicle. But the entire width of the drainage is mine tailings full of willows and prime Moose habitat. There is a trail made by miners going up on the west side of the drainage. This trail eventually goes up into the headwater area where it gets too steep to cross over into other drainages. Again the terrain gets too steep for any kind of vehicle to leave the trail and cause degradation of the area.

Fish Creek is a wider drainage that does not go far into the hills. But Fish Creek offers great Moose habitat between the Rex Trail and the foot hills, along the mining trail. Willows grow all along the trail into the drainage, and once entering the hills the willows get thick. As the trail enters the hills the terrain on both sides gets steep and the creek has steep sides to prevent anyone from going down into the tree chocked creek bed.

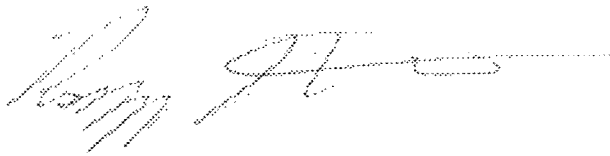
Tatlinka Creek drainage, the miners trail leaves the Rex Trail and runs along the western side of a big meadow. The trail goes up and crosses over the hills through a saddle, then down to the Tatlinka Creek itself. Once there this valley opens up with trails going in all directions. This is a large valley with Grubstake mine working an area several miles south, and up a small creek drainage on the Eastern side. Willows abound throughout the drainage. Every time I go into this drainage I see large numbers of Moose. The maps the area biologist make up showing Moose populations and densities, show large numbers of Moose in this drainage. The information given out during the Moose Seminar reported the Moose migrating from the flats and up into the foothills in August. This is one of the main drainages those Moose move to. In my 42 years of hunting, and exploring the area along the Rex Trail I have never seen anyone going over into this valley during hunting season except miners.

The area Biologist has stated during his presentation, that access is a problem along the Rex Trail, and this area of 20-A. The problem is that these drainages full of Moose are off limits during the General Moose season. Here is a resource going to waste. I ride up these drainages during the November Cow Season and I see several herds of Bull Moose running around, but the cows seemed to have moved out

onto the flats by this time. Opening this area would relieve some of the pressure off the Rex Trail. With the exception of Fish Creek in 41 years I have never seen anyone using these areas during the General Moose season; therefore no one should be impacted. Only Fish Creek has an airstrip, but it is down near the Rex Trail, North of the mining buildings. I know of no other air strips in these areas.

In October the Fairbanks A/C was in favor of this proposal. You can go back and check the minutes of that meeting. After a contentious election in December, the new members are not in favor of this proposal. Some members of the Fairbanks A/C have personal and financial reasons to see that nothing is ever changed with the Wood River Controlled Use Area.

As for the theory about all the Moose being shot out of the Rex Trail, no there is still Moose there. The remaining Moose have learned to hide and avoid motorized vehicles.

A handwritten signature in cursive script, appearing to read "Harry J. ...". The signature is written in dark ink and is positioned at the end of the text block.

RC 57

Additional comment to Sue Entsminger's testimony to clarify my position on the many proposals that restrict non-residents to 10% draw and the elimination of non-residents to the Tok Management Area and Delta Controlled Use Area.

133, 134, 135, 136, 137, 138, 139 I OPPOSE, what would happen if the BOG passed this type of proposals would give BIG OPERATORS the ability to monopolize the drawing, & also would cause BIG COMPANIES who make their money in tag programs to monopolize Alaska guide who would receive tags. This is entirely unnecessary before the DNR is finished.

189, 190 the proposal that eliminate the non-resident component of the draw. I also oppose. This is self-serving. TMA had a management plan years ago to agree to 10%.

Intensive management, I favor all proposals that would implement this program.

142 oppose

143, 144, 146 favor

148 oppose

149 favor

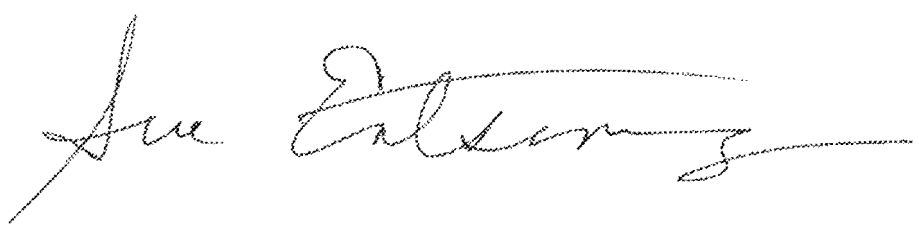
187 GMU 12 moose creates antler restriction 50" 3 bow line for the whole unit. I would favor this only if the proposal was amended to EXTEND THE SEASON. Many other areas in 12 are longer seasons. ADFG has proven that we can have longer seasons with antler restriction. We have all these longer season around us and we are seeing more and more areas close to 50" and longer season proposed. 20E on the road system may have to be also made the same seasons and bag limits.

193 oppose

The rest of the proposals that the Upper Tanana 40-Mile AC commented on, I totally agree. Please consider another comment to those proposals as you see their comments.

THANK YOU FOR THE OPPORTUNITY TO ADD TO MY COMMENTS. YOU HAVE A TREMENDOUS JOB WRESTLING WITH ALL THE COMPLEX ISSUES 7 LISTENING TO ALL THE STRONG OPINIONS. ALASKA IS A PLACE WE ALL CALL HOME. HUNTING, FISHING & TRAPPING IS THE MAJORITY OF ALASKAN IS OUR WAY OF LIFE. WE KNOW YOU WILL ALWAYS REMEMBER THAT HUNTERS NEED TO RESPECT EACH OTHER AND OPEN THEIR MINDS TO WORKING TOGETHER.

THANK YOU FOR ALL YOUR WORK, BOARD MEMBERS.



Harry Reynolds, PO Box 80843, Fairbanks, AK 99708

RC58

Purpose and effectiveness --- Perception vs. Reality:

Purpose of IM is to reduce predation on ungulates important for human use—reduce predators to improve harvest by hunters.

Snaring black bears would not be effective as an IM tool, and the problems associated with allowing the practice will far outweigh any perceived effects and might only result in a "feel good" regulation with no practical effect.

It reduces the status of bears as a valued game animal for resident and non-resident hunters.

Snaring black and grizzly bears reflects poorly on both hunting and trapping, and may jeopardize public safety.

Because take of black bear cubs and females with cubs is allowed under trapping regulations, any hunter with a hunting and trapping license could legally use a rifle to take only the cubs, only the mother or the entire family group.

Purpose of IM is to reduce predation on ungulates important for human use—reduce predators to improve harvest by hunters.

History of reduction of bear populations to increase the survival of moose calves shows it might be effective only in areas with intensive ADFG direct involvement, and then only in small focused areas (580 mi² in the EMMA in McGrath). The effects of increased seasons, bag limits, methods and means has not shown much effect. \$25 tag fee waiver, baiting brown bears, baiting black bears, larger bag limits, etc.

This means of achieving IM would not be effective because when the area included is large, it cannot be focused to areas such as calving grounds, and if it applies in numerous GMUs, then only local residents participate.

While the perception may be that if only snaring is also allowed, then substantial numbers of bears could be reduced is not likely to occur. Practical reasons for this are that:

bucket snares with modified Aldrich springs are expensive and fur auction prices for bear hides are not high;

to be effective, many buckets would have to be set AND checked—researchers use ~20, so if more than 2 bears in any one day were caught, there would be a handling problem—It takes time to skin a bear; and,

maintaining a trap line is time-consuming and many trappers have other jobs during summer.

While the perception may be that allowing snaring by trappers would substantially increase the harvest of black bears the reality may be far less—in Maine, the only other state that allows snaring, only 3% of annual harvest is taken in this manner.

Public safety of capture of grizzly or black bear offspring, if anyone stumbles in vicinity of trap

Harry Reynolds

RC 59



Proposal #167

Lengthen Wolf Hunting Seasons in Units 21, 22, and 24

ADF&G – Amend and Adopt

RAC – Adopt MYAC – Adopt

KRAC – Adopt

GASH – Adopt (Unit 21)

Proposal 167

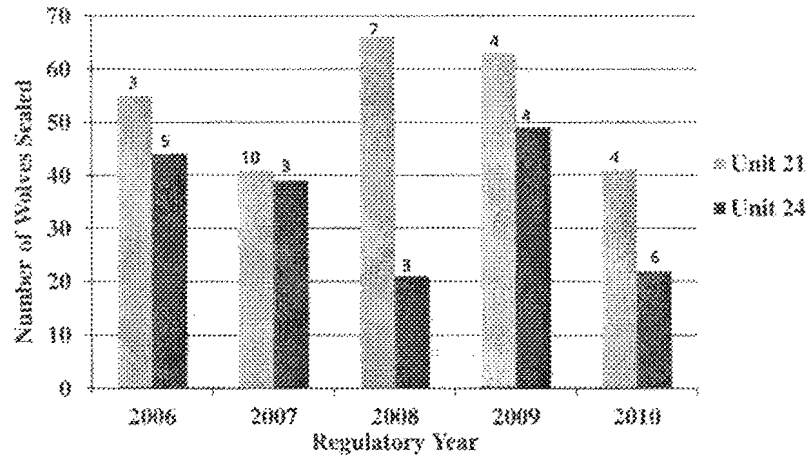
• Lengthen hunting season for wolves in Units 21, 22, & 24

• Current season dates: August 10 – April 30

• Proposed season dates: August 10 - May 31

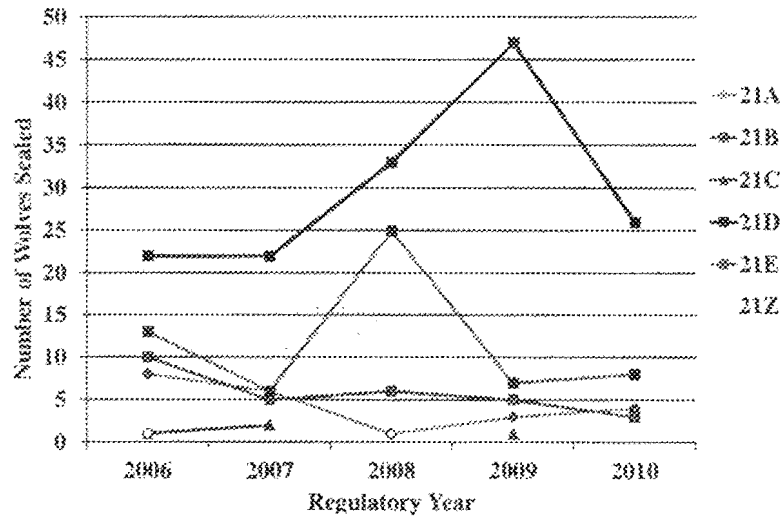
Recommendation: Amend and Adopt (Units 21, 24 only)

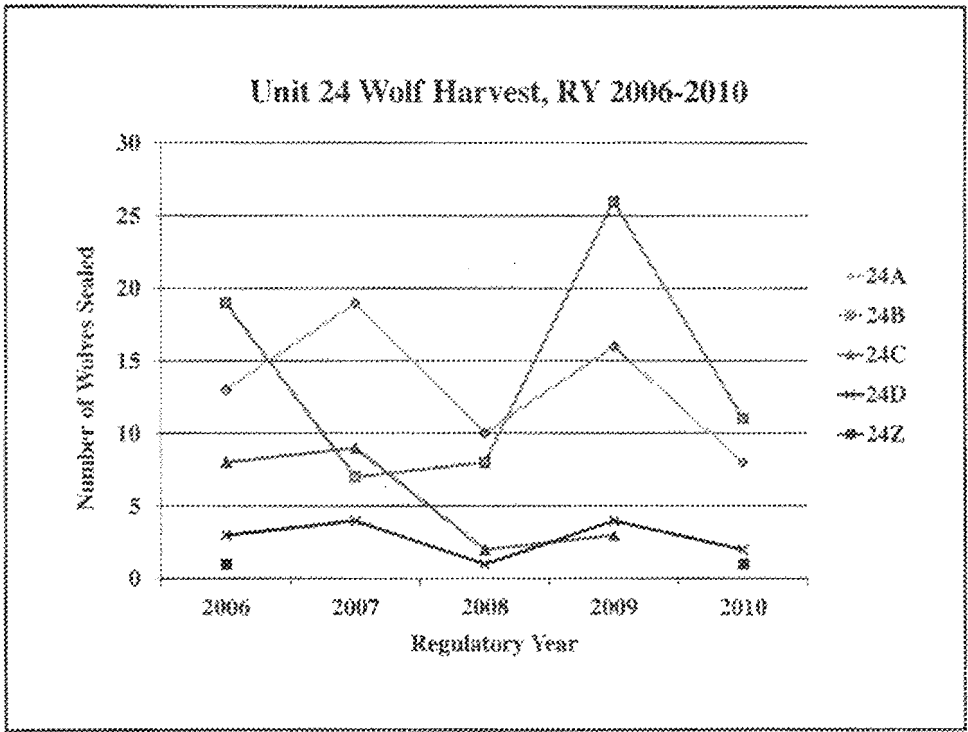
Number of Wolves Sealed RY 2006-2010, Units 21 & 24



Number above bar indicates number of wolves taken under hunting license

Unit 21 Wolf Harvest, RY 2006-2010





Proposal #166

Lengthen Wolf Hunting Seasons in Unit 21

ADF&G – Take No Action

RAC – Adopt MYAC – Adopt

KRAC – Adopt



Proposal #168

Allow Baiting for Grizzly Bears in Unit 21D

ADF&G – No Recommendation

RAC – Adopt MYAC – Adopt

KRAC – Adopt

Proposal 168

Allow harvest of grizzly bears at bait stations in Unit 21D

Recommendation: No Recommendation

- **Unit 21D currently has low annual grizzly bear harvest**
 - **Average of 5 bears per year, 80% male harvest**
 - **2008-2009: 3 bears (2 male)**
 - **2009-2010: 5 bears (4 male)**
 - **2010-2011: 7 bears (6 male)**
 - **Large portion of unit contains dense cover**
 - **Difficult to harvest bears without using bait**
- **Current Black Bear Baiting Seasons:**
 - **Spring: April 15 – June 30**
 - **Fall: August 1 – October 25**



Proposal #169

Lengthen Lynx Trapping Season in Unit 21

ADF&G – Amend and Adopt

MYAC – Do Not Adopt RAC – Adopt

KRAC – Do Not Adopt

McGrath & GASH – Adopt

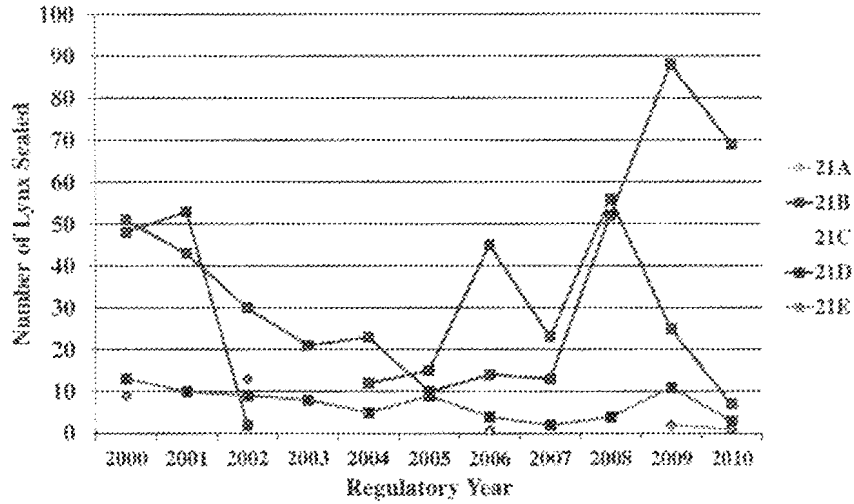
Proposal 169

- Lengthen trapping season for lynx in Unit 21
- Current season dates: November 1 – February 29
- Proposed season dates: November 1 – March 31

Recommendation: Amend and Adopt

- Amend to include Unit 24

Lynx Harvest Unit 21, RY 2000-2010



Lynx Harvest Unit 24, RY 2006-2010

