



IN REPLY REFER TO
OSM 16094.PM

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

DEC 06 2016

Mr. Ted Spraker, Chairman
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

ATTN: Board of Game Comments

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet January 6-9, 2017 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Arctic and Western Region. We have reviewed the 45 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 George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Eugene R. Peltola Jr.,
Assistant Regional Director

Enclosure



Chairman Spraker

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cc: Tony Christianson, Chair, Federal Subsistence Board
Stewart Cogswell, Acting Deputy Assistant Regional Director
Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Chief, Office of Subsistence Management
Kristy Tibbles, Executive Director, Board of Game, Board Support Section
Alaska Department of Fish and Game
Bruce Dale, Wildlife Division Director, Alaska Department of Fish and Game
Jill Klein, Federal Subsistence Liaison Team Leader
Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Arctic and Western Region

January 6-9, 2017

Bethel, Alaska

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



PROPOSAL 2 – 5 AAC 92.010. Harvest tickets and reports; and 85.025. Hunting seasons and bag limits for caribou. Modify the hunt structure of the Western Arctic and Teshekpuk caribou herds.

Note: This proposal is scheduled for the Arctic/Western Region meeting as Proposal 2 and the Interior/Northeast Arctic Region meeting as Proposal 103.

Current Federal Regulation:

Unit 21D remainder – Caribou

Unit 21D, remainder—5 caribou per day, as follows: Calves may not be taken

Bulls may be harvested

July 1-Oct. 14.

Feb. 1-June 30.

Cows may be harvested

Sep. 1-Mar. 31.

Unit 23 – Caribou

Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage—5 caribou per day as follows:

Calves may not be taken

Bulls may be harvested

July 1-Oct. 14.

Feb. 1-June 30.

Cows may be harvested. However, cows accompanied by calves may not be taken July 15-Oct. 14

July 15-Apr. 30.

Unit 23, remainder—5 caribou per day, as follows: Calves may not be taken

Bulls may be harvested

July 1-Oct. 31.

Feb. 1-June 30.

Cows may be harvested. However, cows accompanied by calves may not be taken July 31-Oct. 14

July 31-Mar. 31.

Unit 24 – Caribou

Units 24A remainder, 24B remainder—5 caribou per day as follows:

Calves may not be taken

Bulls may be harvested

July 1-Oct. 14.

Feb. 1-June 30.

Cows may be harvested.

July 15-Apr. 30.



*Units 24C, 24D—5 caribou per day as follows: Calves may not be taken
Bulls may be harvested*

*July 1-Oct. 14.
Feb. 1-June 30.
Sep. 1-Mar. 31.*

Cows may be harvested

Unit 26A – Caribou

*Unit 26A—that portion of the Colville River drainage upstream from the
Anaktuvuk River, and drainages of the Chukchi Sea south and west of, and
including the Utukok River drainage—5 caribou per day as follows: Calves
may not be taken*

Bulls may be harvested

*July 1-Oct. 14.
Dec. 6-June 30.
July 16-Mar. 15.*

*Cows may be harvested; however, cows accompanied by calves may not be
taken July 16-Oct. 15*

*Unit 26A remainder—5 caribou per day as follows: Calves may not be taken
Bulls may be harvested*

*July 1-Oct. 15.
Dec. 6-June 30.
July 16-Mar. 15.*

*Up to 3 cows per day may be harvested; however, cows accompanied by
calves may not be taken July 16-Oct. 15*

Unit 26B – Caribou

*Unit 26B, that portion south of 69°30' N. lat. and west of the Dalton
Highway—5 caribou per day as follows:*

Bulls may be harvested

*July 1-Oct. 14.
Dec. 10-June 30.
July 1-Apr. 30.*

Cows may be harvested

Unit 26B remainder—5 caribou per day as follows:

Bulls may be harvested

July 1-June 30.

Cows may be harvested

July 1-May 15.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: This proposal would increase the regulatory burden on Federally qualified subsistence users by requiring them to obtain a registration permit. However, data provided by this proposal would be extremely useful in tracking harvest of the Western Arctic Caribou



Herd (WACH) and the Teshekpuk Caribou Herd (TCH), including determining if overharvest is occurring by herd and/or by sex (i.e. > 2% of cows in harvest). Currently, harvest is extrapolated from community harvest surveys and it is difficult to determine what role human harvest may be having on the current status of both herds. This proposal would also allow for increased management flexibility and quicker responses to changing conditions by allowing for more responsive management action via harvest monitoring.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: This proposal would aid in the conservation of the WACH and TCH, vital subsistence resources. However, due to the large amount of Federal public lands over much of the range of both herds, in order for this proposal to be truly effective, a similar proposal would need to be approved by the Federal Subsistence Board.

PROPOSAL 3 – 5 AAC 92.010(g). Harvest tickets and reports. Remove the exception to harvest tickets and reports for caribou

Current Federal Regulation:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: Requiring Federally qualified subsistence users residing north of the Yukon River to obtain a harvest ticket and submit reports when hunting caribou could be burdensome especially for those residents living in very remote areas. Obtaining accurate harvest information using harvest tickets would provide useful information for Federal and State agencies responsible for managing caribou populations.

There would be no impact to caribou if this proposal was adopted.

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

Rationale: The data gathered from harvest ticket reports are an important management tool that provides valuable information to aid caribou population management decisions. The TCH has declined 40% since 2008 and the WACH has declined 50% since 2003. To address these declines, changes were made to



State regulations for 2015/2016 and 2016/2017 and to Federal regulations for 2016-2018. Accurate harvest information on location, number, date of harvest and sex is needed to monitor the effects of hunting pressure.

PROPOSAL 11 - 5 AAC 92.010(h). Harvest tickets and reports. Remove the exception to harvest tickets and reports for sheep.

Current Federal Regulation:

Unit 23—Sheep

<i>Unit 23, remainder (Schwatka Mountains) that portion within Gates of the Arctic National Park and Preserve—1 ram with 7/8 curl or larger horn</i>	<i>Aug. 10 – Sep. 20</i>
<i>Unit 23, remainder (Schwatka Mountains) that portion within Gates of the Arctic National Park and Preserve—1 sheep</i>	<i>Oct. 1 – Apr. 30</i>

Unit 24—Sheep

<i>Units 24A and 24B—(Anaktuvuk Pass residents only)—that portion within the Gates of the Arctic National Park—community harvest quota of 60 sheep, no more than 10 of which may be ewes, and a daily possession limit of 3 sheep per person, no more than 1 of which may be a ewe</i>	<i>July 15 – Dec. 31</i>
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<i>Units 24A and 24B—(excluding Anaktuvuk Pass residents)—that portion within the Gates of the Arctic National Park—3 sheep, no more than one of which may be a ewe, by Federal registration permit only, with exception for residents of Alatna and Allakaket who will report by a National Park Service community harvest system</i>	<i>Aug. 1 – Apr. 30</i>
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Unit 26—Sheep

<i>Unit 26A and 26B—(Anaktuvuk Pass residents only)—that portion within the Gates of the Arctic National Park—community harvest quota of 60 sheep, no more than 10 of which may be ewes and a daily possession limit of 3 sheep per person, no more than 1 of which may be a ewe</i>	<i>July 15 – Dec. 31</i>
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<i>Unit 26A—(excluding Anaktuvuk Pass residents)—those portions within the Gates of the Arctic National Park—3 sheep</i>	<i>Aug. 1 – Apr. 30</i>
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Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.



Impact to Federal Subsistence users/wildlife: Adoption of this proposal will have no effect on Federally qualified subsistence users' opportunities to harvest sheep. However, it will resolve ambiguity associated with permitting and reporting requirements for sheep harvest within Gates of the Arctic National Park.

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

Rationale: Gates of the Arctic National Park is closed to the harvest of sheep except to those eligible under Federal subsistence regulations. Consequently, there is no requirement for hunters to acquire a State issued harvest ticket, making this exception irrelevant. Deleting the exception will resolve any ambiguity associated with permitting and reporting requirements for sheep harvest within Gates of the Arctic National Park.

PROPOSAL 17 – 5 AAC 92.990 (26). Definitions. Change the definition of “edible meat” for game birds.

Current Federal Regulation:

§100.25(a) Definitions

Edible meat means the breast meat of ptarmigan and grouse, and those parts of caribou, deer, elk, mountain goat, moose, muskox, and Dall sheep that are typically used for human consumption, which are: The meat of the ribs, neck, brisket, front quarters as far as the distal (bottom) joint of the radius-ulna (knee), hind quarters as far as the distal joint (bottom) of the tibia-fibula (hock) and that portion of the animal between the front and hindquarters; however, edible meat of species listed in this definition does not include: Meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, and incidental meat reasonably lost as a result of boning or close trimming of the bones, or viscera. For black bear, brown and grizzly bear, “edible meat” means the meat of front quarter and hindquarters and meat along the backbone (backstrap).

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations, which may increase regulatory complexity, user confusion, and law enforcement concerns. Processing time for game birds would increase. There are no biological concerns for this proposal. It should be noted that the Federal Subsistence Board only regulates grouse and ptarmigan, while the subsistence harvest of migratory birds is managed by the U.S. Fish and Wildlife Service. A companion proposal would need to be submitted to the Federal Subsistence Board to adopt this



language into Federal Subsistence regulations for grouse and ptarmigan to gain consistency across State and Federal regulations.

Federal Position/Recommended Action: The OSM position is to **oppose** this proposal.

Rationale for comment: This proposal would increase regulatory complexity and place additional burden on Federally qualified subsistence users.

PROPOSAL 18 - 5 AAC 92.015. Brown bear tag fee exemptions. Reauthorize resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a)(3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted it would continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users must purchase a \$25 tag before hunting brown bears in these units. Retaining this tag fee exemption is particularly important in areas where there are few vendors and local economies are in a depressed state.

PROPOSAL 21 - 5 AAC 85.045. Hunting seasons and bag limits for moose. Open a winter hunting season for moose in Unit 18.

Current Federal Regulation:

Unit 18—Moose

Unit 18—Goodnews River drainage and south to the Unit 18 boundary—1 Sep. 1 – 30



antlered bull by State registration permit. Any needed closures will be announced by the Togiak National Wildlife Refuge Manager after consultation with BLM, ADF&G, and the Chair of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: In the short term, creation of a winter moose season in the Goodnews hunt area would provide additional opportunities for Federally qualified subsistence users to harvest moose. However, if additional harvest is not sustainable and results in a population decline, subsistence users in the area would be negatively impacted.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on this proposal.

Rationale: Although there is anecdotal evidence that the moose population in the Goodnews River drainage is growing, it is not clear whether the population can withstand a 50% increase in the annual harvest quota. OSM defers to the expertise and judgment of local Federal and State biologists as to whether the creation of a winter season is advisable.

PROPOSAL 23 - 5 AAC 85.045(16). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting seasons in the Remainder of Unit 18.

Current Federal Regulation:

Unit 18—Moose

Unit 18 remainder—2 moose, only one of which may be antlered. Antlered bulls may not be harvested from Oct. 1 through Nov. 30

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users.

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

Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to



harvest moose in this unit and would provide management flexibility.

PROPOSAL 29 - 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a hunting season for caribou in Unit 22A by emergency order only.

Current Federal Regulation:

Unit 22—Caribou

Unit 22A, remainder—5 caribou per day. Calves may not be taken *July – 1 June 30,
season may be
announced*

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: Adoption of this proposal will have no effect on Federally qualified subsistence users.

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

Rationale: The goal of this proposal appears to be allowing for caribou harvest in southern Unit 22 only when caribou are present. Currently, in both State and Federal regulation, the caribou season in this hunt area is open by announcement only. Consequently, adoption of this proposal will have no effect on season openings. The proponent also suggests liberalization of the harvest limits and restrictions. Given that both the Federal and State Boards have recently adjusted regulations across this herd’s range in response to a population decline, liberalization of limits and restrictions is not warranted.

PROPOSAL 31 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Increase the bag limit for brown bear in Unit 22B.

Current Federal Regulation:

Unit 22—Brown Bear

Units 22A, 22B, 22D remainder, and 22E—1 bear by State registration *Aug. 1 – May 31*
permit only

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to



change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: In the short term, increasing the harvest limit would provide additional opportunities for Federally qualified subsistence users to harvest brown bears. However, if additional harvest is not sustainable and results in a population decline, subsistence users in the area would be negatively impacted. Changing the harvest limit would result in misaligned Federal and State regulation, increasing regulatory complexity.

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

Rationale: Recent surveys show that brown bear density on the Seward Peninsula is comparable to the previous estimate obtained in the early 1990s. Despite this new data, however, the population trajectory of brown bears on the Seward Peninsula is unknown, due to insufficient survey data in the intervening years. Given the uncertainty associated with current population trends, along with the doubling of annual reported harvest since the 1990s, liberalization of harvest limits is not warranted at this time and may pose a threat to the conservation status of brown bears in this area.

PROPOSAL 32 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Lengthen the hunting season for brown bear in Unit 22A.

Current Federal Regulation:

Unit 22—Brown Bear

Units 22A, 22B, 22D remainder, and 22E—1 bear by State registration permit only Aug. 1 – May 31

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: In the short term, extending the season would provide additional opportunities for Federally qualified subsistence users to harvest brown bears. However, if additional harvest is not sustainable and results in a population decline, subsistence users in the area would be negatively impacted. Extending the season would result in misaligned Federal and State regulation, increasing regulatory complexity.

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

Rationale: Recent surveys show that brown bear density on the Seward Peninsula is comparable to the previous estimate obtained in the early 1990s. Despite this new data, however, the population trajectory of brown bears on the Seward Peninsula is unknown, due to insufficient survey data in the intervening



years. Given the uncertainty associated with current population trends, along with the doubling of annual reported harvest since the 1990s, extending the season is not warranted at this time and may pose a threat to the conservation status of brown bears in this area.

PROPOSAL 33 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 26.

Current Federal Regulations:

Unit 26A—Moose

Unit 26A—that portion of the Colville River drainage upstream from and including the Anaktuvuk River drainage—1 bull Aug. 1 – Sept. 14

Unit 26A— that portion of the Colville drainage upstream from and including the Anaktuvuk River drainage—1 moose, however you may not take a calf or a cow accompanied by a calf. Feb. 15 – Apr. 15

Unit 26A—that portion west of 156°00’W Long. and excluding the Colville River Drainage—1 moose, however, you may not take a calf or a cow accompanied by a calf. July 1 – Sept. 14

Unit 26A, remainder—1 bull Aug. 1 – Sept. 14

Unit 26B— excluding the Canning River drainage—1 bull Aug. 1 - Sept. 14

Unit 26B remainder and 26C—1 moose by Federal registration permit by residents of Kaktovik only. Federal public lands are closed to the taking of moose except by a Kaktovik resident holding a Federal registration permit and hunting under these regulations. May be announced

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in the western portion of Unit 26A would provide additional opportunity for Federally qualified subsistence users to harvest moose. Anterless moose harvest under State regulations is limited primarily through the use of drawing permit hunts. Although moose numbers in Unit 26A are at the lowest level since 1970, due to the very limited season from Jul. 1 – Sept. 14, and because very few moose are typically harvested in this hunt, reauthorizing the antlerless season is not anticipated to have a negative impact on this population.

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

Rationale: Reauthorizing the State antlerless season will retain management flexibility in Unit 26A and



allow Federally qualified subsistence users additional opportunity to harvest a moose in this unit.

PROPOSAL 34 – 5 AAC 85.057. Hunting seasons and bag limits for wolverine. Lengthen the hunting season for wolverine in Unit 26.

Current Federal Regulation:

Unit 26— Wolverine

5 wolverines

Sept. 1–Mar. 31

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users would be provided more opportunity to harvest wolverine under the proposed hunting regulations. Although the proponent mentioned a change in bag limits for wolverine, no specific recommendation was made.

Wolverines, which occur at low densities throughout Alaska have large home ranges ranging from 39 mi² to 386 mi². The breeding season extends from May through August. Following implantation which generally occurs from November through March, and a gestation period of 30-40 days, 1-2 young are born between February and April. The kits remain with female for 12-14 weeks. Therefore, kits born in late April would be just leaving the den in late July. Adoption of this proposal would extend the harvest into the denning period. While females likely only leave the dens for short periods of time to access food, the risk of litter loss would increase.

Although there is considerable underreporting, the reported wolverine harvests from 2009-2012 indicate that the hunting and trapping harvest is sustainable for Unit 26. However, the biological impact of extending the harvest season is unknown.

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

Rationale: The proposed change to extend the hunting season to mid-July would overlap with wolverine breeding and the denning period. This proposed change would also result in misalignment of Federal and State wolverine hunting seasons for Unit 26. Maintaining the current harvest season from Sept. 1 – Mar.31 is recommended.

PROPOSAL 36 – 5 AAC 85.045(21). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting seasons in Unit 23.

Current Federal Regulation:



Unit 23 – Moose

Unit 23—that portion north and west of and including the Singoalik River drainage, and all lands draining into the Kukpuk and Ipewik Rivers—1 moose; no person may take a calf or a cow accompanied by a calf July 1-Mar. 31.

Unit 23—that portion lying within the Noatak River drainage—1 moose; however, antlerless moose may be taken only from Nov. 1-Mar. 31; no person may take a calf or a cow accompanied by a calf Aug. 1-Mar. 31.

Unit 23, remainder—1 moose; no person may take a calf or a cow accompanied by a calf Aug. 1-Mar. 31.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users.

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

Rationale: This proposal would allow for additional opportunity for Federally qualified subsistence users to harvest moose in this unit and would provide management flexibility.

PROPOSAL 44 – 5 AAC 92.540(9)(A). Controlled use areas. Modify the area of the Noatak Controlled Use Area in Unit 23.

Current Federal Regulation:

§100.26 Subsistence taking of wildlife.

(23)(ii)(A) You may not use aircraft in any manner either for hunting of ungulates, bear, wolves, or wolverine, or for transportation of hunters or harvested species in the Noatak Controlled Use Area for the period August 15-September 30. The Area consists of that portion of Unit 23 in a corridor extending 5 miles on either side of the Noatak River beginning at the mouth of the Noatak River, and extending upstream to the mouth of Sapun Creek. This closure does not apply to the transportation of hunters or parts of ungulates, bear, wolves, or wolverine by regularly scheduled flights to communities by carriers that normally provide scheduled air service.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to



change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: Adoption of this proposal could increase opportunity for Federally qualified subsistence users, particularly from the village of Noatak by reducing competition and conflict with nonlocal hunters who access the area by plane rather than by boat. The migration route of the Western Arctic Caribou herd has shifted east in recent years. From 2012-2014, the WACH migrated through Ivishak Pass at the head of the Cutler River, indicating Federally qualified subsistence users may need to travel to the confluence of the Cutler and Noatak Rivers in order to harvest caribou in some years. Adoption of this proposal would result in misalignment of Federal and State definitions of the Noatak Controlled Use Area, which is primarily an administrative issue and not a functional one. Technically, Federally qualified subsistence users could still access the Noatak River between Sapun Creek and the Cutler River by plane from Aug. 15-Sep. 30 under Federal regulations, although the likelihood of this is very low. There are no conservation concerns for this proposal.

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

Rationale: This proposal would benefit Federally qualified subsistence users. One alternative would be to extend the Noatak CUA to the mouth of the Nimiuktuk River where conflicts between Noatak residents and non-local hunters have been documented. However, caribou migration patterns in recent years may result in negative encounters between local and non-local hunters at the mouth of the Cutler River.

PROPOSAL 47 – 5 AAC 92.990 (26). Definitions. Change the definition of “edible meat” for game birds as follows:

Current Federal Regulation:

§100.25(a) Definitions

Edible meat means the breast meat of ptarmigan and grouse, and those parts of caribou, deer, elk, mountain goat, moose, muskox, and Dall sheep that are typically used for human consumption, which are: The meat of the ribs, neck, brisket, front quarters as far as the distal (bottom) joint of the radius-ulna (knee), hind quarters as far as the distal joint (bottom) of the tibia-fibula (hock) and that portion of the animal between the front and hindquarters; however, edible meat of species listed in this definition does not include: Meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, and incidental meat reasonably lost as a result of boning or close trimming of the bones, or viscera. For black bear, brown and grizzly bear, “edible meat” means the meat of front quarter and hindquarters and meat along the backbone (backstrap).

See comments for Proposal 17



Western Arctic Caribou Herd Working Group

Goal: To work together to ensure the long-term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, to maintain traditional and other uses for the benefit of all people now and in the future.

Chair: Vern Cleveland, Sr.

Vice-Chair: Cyrus Harris

P.O. Box 175, Nome, AK 99762

December 19, 2016

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

SUBJECT: Board of Game Proposals 1, 2, 4, 44 and 45

To the Alaska Board of Game:

At its December 14-15, 2016 meeting, the Western Arctic Caribou Herd (WACH) Working Group voted to submit the following comments to the Alaska Board of Game on regulatory proposals 1, 2, 4, 44 and 45 for the Arctic/Western Region.

PROPOSAL 1 – 5 AAC 99.025. Customary and traditional uses of game. Evaluate a separate amount reasonably necessary for subsistence for the Teshekpuk caribou herd...

Comment The WACH Working Group voted to support Proposal 1.

PROPOSAL 2 – 5 AAC 92.010. Harvest tickets and reports; and 85.025. Hunting seasons and bag limits for caribou. Modify the hunt structure of the Western Arctic and Teshekpuk caribou herds ... in Units 21, 23, 24, and 26 by establishing a registration permit hunts within the range of these herds.

Comment: The WACH Working Group voted to support Proposal 2.

PROPOSAL 4 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Institute no-fly zones for caribou hunting in Units 21D, 22, 23, 24, & 26A ...

Comment The WACH Working Group voted to oppose Proposal 4.

PROPOSAL 44 – 5 AAC 92.540(9)(A). Controlled use areas. Modify the area of the Noatak Controlled Use Area in Unit 23 as follows: ... extending upstream to the mouth of the **Cutler River** [SAPUN CREEK].

Comment The WACH Working Group voted to support Proposal 44.



PROPOSAL 45 – 5 AAC 92.540(9)(A). Controlled use areas. Require big gam hunting camps to be three miles apart within and near the Noatak Controlled Use Area ...

Comment The WACH Working Group voted to support Proposal 45 with the amended wording below, which was presented to the group by Enoch Mitchell, WACH Working Group member and Noatak/Kivalina Advisor Committee Chair.

Amended working: (iii) Big game hunting camps are required to be located on the south side of [SPACED AT LEAST THREE MILES APART ON] the Agasisuak, Eli, and Squirrel Rivers. This would allow the caribou to migrate with less disruption.

The Working Group took no action on Proposal 3. They noted that the registration permit hunt established through Proposal 2 would be a better tool to monitor harvest and provide data for herd management.

Thank you for this opportunity to comment.

On behalf of the Western Arctic Caribou Herd Working Group,

A handwritten signature in cursive script that reads "Vern Cleveland Sr.".

Vern Cleveland, Sr., Chair



Submitted By

Todd walter

Submitted On

10/28/2016 10:05:14 PM

Affiliation

Comment regarding PROPOSAL 17 -5 AAC 92.990(26).

Wings of small game birds have traditionally been used as attractants for trapping purposes and I believe should remain so. The amount of meat that could be salvaged is minuscule. Therefore in my opinion the value of the wing for trapping purposes is far greater.



Submitted By
Ed Schmitt
Submitted On
12/22/2016 10:10:26 AM
Affiliation
Alaska Wildlife Alliance

Phone
9072603386

Email
schmitt.edward@gmail.com

Address
319 Riverside Dr
Soldotna, Alaska 99669

Proposal 155:

We think this would be a colossal waste of money for an extremely minimal return. Even if the state of Alaska had all the money in the world, spending the hundreds of thousands of dollars this program will cost would be about the worst investment imaginable. Most residents of the Kenai Peninsula would prefer to see ecosystems managed for biological diversity and do not feel that all wolves need to be exterminated so that seven more moose might be killed.



From: edward schmitt
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposal 155, Intensive Management unit 15c
Date: Tuesday, December 20, 2016 4:38:27 PM

We think this would be a colossal waste of money for an extremely minimal return of possibly seven more moose for hunters to kill. Even if the state of Alaska had all the money in the world, spending the hundreds of thousands of dollars this program will cost would be about the worst investment imaginable. Most residents of the Kenai Peninsula would prefer to see ecosystems managed for biological diversity and do not feel that all wolves need to be exterminated so that seven more moose might be killed.

Edward A Schmitt MD
Alaska Wildlife Alliance



Submitted By
Fran Mauer
Submitted On
12/22/2016 11:35:13 AM
Affiliation
Alaskans FOR Wildlife

Phone
907-455-6820
Email
fmauer@mosquitonet.com
Address
791 Redpoll Ln
Fairbanks, Alaska 99712

Comments to the Alaska Board of Game Regarding ACR 155

Submitted by Fran Mauer on Behalf of Alaskans FOR Wildlife

December 22, 2016

Dear Members of the Alaska Board of Game:

I am providing the following comments regarding ACR proposal 155 on behalf of Alaskans FOR Wildlife. We are citizen cooperators living in many locations around the State, and are dedicated to advancing respect and appropriate stewardship of Alaska's great wildlife through education and advocacy.

Proposal 155 would amend and activate a predator control program in Unit 15 C of the Kenai Peninsula that would allow for the removal of all wolves from "public and private lands" within the unit. It would also authorize the continuation of a wolf control program for Unit 15 C until at least 2022.

A wolf control program for 15 C was originally established by the Board in 2012. It was highly controversial at the time and remains so today. The 2012 program has never been implemented. In 2012 the proposal to control wolves in 15 C was added to the Board's agenda at the last minute, without sufficient time for proper review by the public. Also, the 2012 Board meeting was held in Barrow, which is very distant from most of the concerned public. These circumstances resulted in greatly limiting the opportunity for informed comments. Now, it seems the same tactic is in operation again: a last minute announcement for the current proposed action (proposal # 155) and it is to be considered at a BOG meeting in Bethel, far from where most of the concerned citizens reside. The BOG often claims its procedures are a model of excellence in public involvement, however, actions such as this speak otherwise.

The manner in which ACR 155 has been advanced is not consistent with the Board's ACR policy. There is no emergency regarding moose or wolf predation in 15 C; adequate advance notice has not been provided; and the ACR does not explain why the proposed action merits consideration out of the normal sequence of Board schedules. It appears that by the last minute announcement, and by meeting in Bethel, as well as not following your own policies, that you are again attempting to sneak this controversial action past the public with only minimal input, and avoid accountability for your actions.

The 2012 proposal for wolf control in Unit 15 C was seriously flawed in that it attempted to justify killing wolves to improve a low ratio of bull to cow moose which was actually due to hunting rather than wolf predation. The Department of Fish and Game has consistently informed the Board that habitat conditions and hunting are the primary influences of moose abundance on the Kenai. Wolf predation is not a primary factor. Furthermore, Proposal 155 does not provide any evidence that wolf predation is responsible for a 2015 moose harvest in 15 C that happened to fall only 7 moose short of the objective.

No data is provided with #155 regarding the illegal take of moose and the effect of antler regulations on the over-all take of moose in 15 C. A slight modification of antler restrictions (allowing the take of bulls with three, rather than four brow tines) would likely bring the annual harvest within objective levels. Proposal 155's use of the 2015 harvest (7 moose shy of the objective) is an illegitimate justification for invoking wolf control while ignoring alternatives such as modification of antler restrictions. This amounts to no more than a flimsy effort to



keep the 2012 predator program on the books and to inappropriately justify removal of all wolves from the specified area within 15 C s

also an abuse of the very protocols that have been established for the intensive management program.

Alaskans FOR Wildlife are very concerned that although in 2012 the Department informed the BOG that wolf predation was not limiting moose on the Kenai, but rather habitat was the limiting factor, it appears that the BOG intends to kill wolves because wolves take moose that theoretically some hunters might otherwise harvest. This faulty rationale, if adopted would set an unacceptable precedent that could ultimately lead to the widespread killing of wolves and bears anywhere in Alaska where there are moose and hunters. Such policy creep goes far beyond the intention of the intensive management law itself.

Intensive management has been in existence for the past 22 years and although many extensive predator control programs have been implemented in various areas of Alaska at a cost of well over a million dollars per year, the State wide harvest of moose has not significantly increased. We can find no convincing information associated with this proposal to indicate that it will be any more successful than all of the wasteful, ineffective efforts of the past. Therefore we are opposed to proposal 155, and urge that you reject it. We also recommend that the BOG not renew the 2012 wolf control program as well, because it too is not justified by sound science or any other sensible rationale.

Thank you for the opportunity to comment.

Sincerely,

Fran Mauer

791 Redpoll Ln

Fairbanks, AK 99712



Submitted By
Sharon Alden
Submitted On
12/20/2016 9:37:13 AM
Affiliation

This comment is in regards to the proposal to kill all the wolves in Game Unit 15C. This seems both a waste of state resources and a grossly wrong headed move. As those responsible for managing game it should not be your priority to just make more moose available by eliminating any other predators with more than two legs. I have read that 20% of the moose taken in this unit were illegal due to being too young. 20% is a huge amount and by working on education you can more cheaply and sanely manage this resource properly.

Alaska often likes to point out our differences from the lower 48. Let's not follow their lead by wiping out the apex predators who are a vital part of a healthy ecosystem

Sincerely,

Sharon Alden



Submitted By
Joel Bennett
Submitted On
12/20/2016 3:31:05 PM
Affiliation
self

Phone
9077891718

Email
killik@gci.net

Address
15255 Point Louisa Rd
Juneau, Alaska 99801

As an Alaska licensed hunter for each of the past 48 years, I strongly oppose Proposal #155, creating a predation control area in GMU 15c for the purpose of removing all wolves by aircraft or other means.

This proposal is of doubtful cost effectiveness, has no biological justification, and does not enjoy wide public acceptance. These are the tests that I believe must be employed to justify wolf control. Moreover, as a hunter I oppose these methods of control as unethical and inhumane, and believe the damage done to our image as responsible hunters in Alaska by such actions is significant. It is time to recognize that the diverse values of wildlife users in this state are poorly served by proposals of this nature.



Submitted By
Cheryl Blizzard
Submitted On
12/21/2016 6:36:37 AM
Affiliation

Phone
9074790199

Email
blizzardsherry@gmail.com

Address
3205 Forrest Drive
Fairbanks, Alaska 99709

Dear Board of Game Members,

I am very much opposed to the last-minute proposal to remove the wolves from 15C just north of Kachemak Bay. It is bad enough that wolves have been almost eliminated from Denali Park, but now this? It does not make sense to deplete the wolves from this area and, if left unattended, wolves will manage their own population. The moose population has remained steady in 15c with a slight decrease in calf survival (mostly due to black bears). Until studies are conducted to establish a true number of wolf packs in the area, and the impact of predation by wolves and both black and brown bears, I am opposed to even mentioning aerial wolf control.

Yours truly,

Cheryl Blizzard



Submitted By
Kiche Braendel
Submitted On
12/21/2016 1:11:09 AM
Affiliation

In regards to proposal #155.

The evidence for intensive management is threadbare at best. Using year to year harvest data doesn't tell you anything because of the sheer amount of variables in play. The unit has a high rate of illegal kill which can easily effect the number of legal animals from year to year as well as habitat and winter kill considerations. There isn't any 'scientific' reason to do this. It's just an excuse to shoot wolves for fun. As people we should be better than that.



From: Gerald Brookman
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments on PredatorControl on the Kenai Peninsula
Date: Thursday, December 22, 2016 2:26:07 PM

To: Alaska Board of Game

From: Gerald R. Brookman, 715 Muir Ave., Kenai, Alaska 99611-8816

I understand that one of the proposals before the Board of Game at its meeting in Bethel is a reduction of predators on moose in Game Management Unit 15(C). I am completely opposed to this proposal, and I urge you to reject it. I believe that there is not a predator problem in this area, but a habitat problem. Those who would like to solve all our problems by simply eliminating predators are, in my opinion, wrong. This plan harkens back to the days of "The only good wolf is a dead wolf". Wolves have an important place in the ecosystems of the Kenai Peninsula, and I hope that you will see fit to completely reject this proposal. I have been an Alaska resident since 1957, and a Kenai Peninsula Resident since 1978.



From: roy catalano
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Cc:

Subject: Proposal 155
Date: Thursday, December 22, 2016 5:14:44 AM
Attachments: [Total Moose Harvest 1994-2015.pptx](#)

Dear Sirs:

I am against proposal 155 in removing all wolves in all public and private lands in the Kenai area.

There never has been convincing scientific data to show that removal of predators, bears or wolves have increased the number of moose or caribou for hunters whether subsistence or not. See attachment above. There has not been an increase since predator control has been in place. More money and effort has been wasted without the results you were looking for.

Another predator control proposal without convincing data is just criminal to think that this action will increase prey animals. The real issue is that there is not enough habitat, food, for moose to eat now, and so killing off predators will not help increase moose. There is need for more habitat to provide food.

Over the last 20 years since the 1994 law, the data release from Alaska Fish and Game show no increase. Why does the state continue to feel this archaic process is going to bring good results. It is like doing the same thing over and over expecting different results.

Let the predators alone and let the ecosystem balance itself.

Roy Catalano
P.O.Box 353
Denali, Alaska 99755
roycatalano@gmx.com

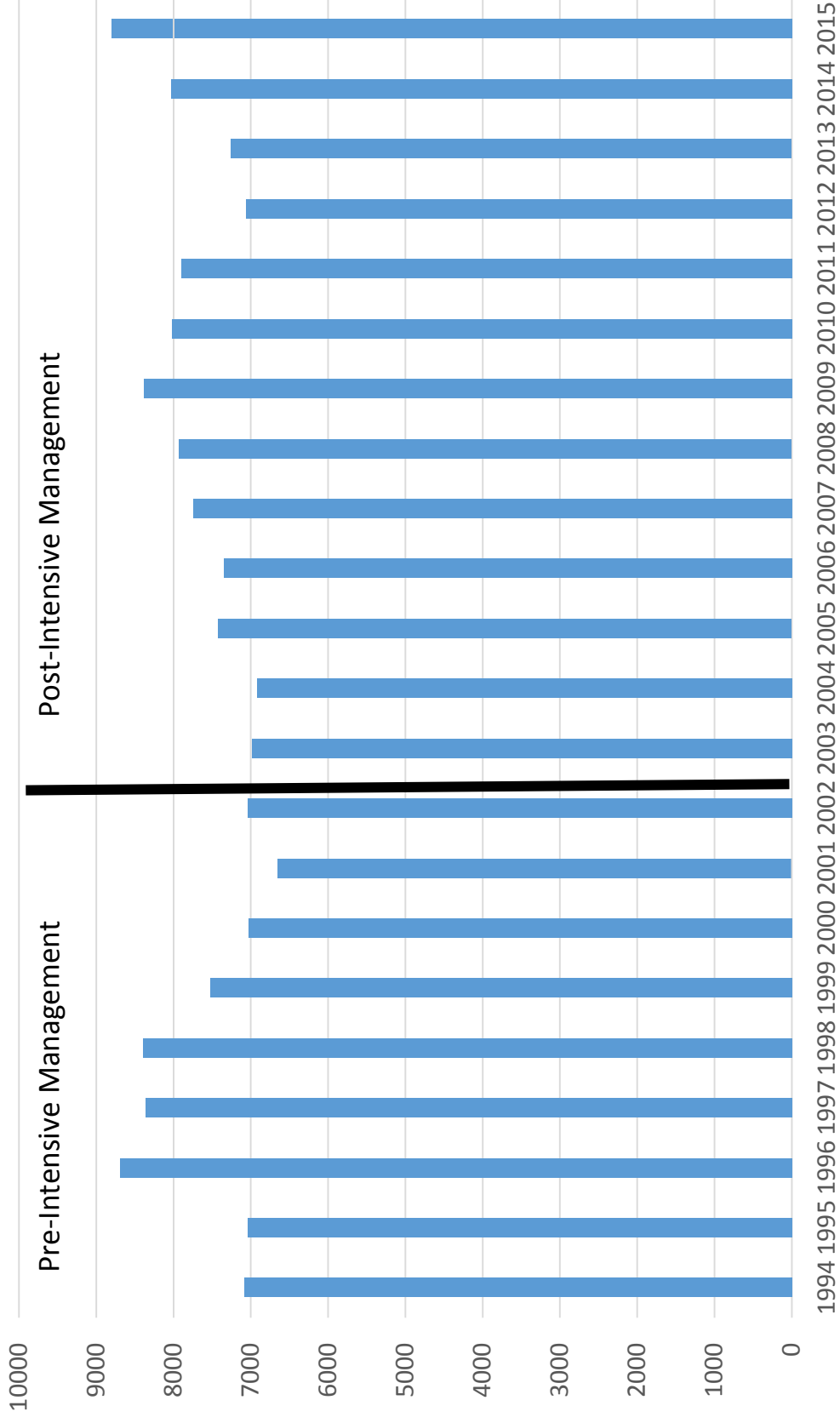
Submitted By
roy catalano
Submitted On
12/19/2016 12:33:10 PM
Affiliation
Alaskan FOR Wildlife
Phone
719-331-7221
Email
roycatalano@gmx.com
Address
P.O.Box 353
Denali , Alaska 99755

I am against wolf predator control in the Kenai Area since the habitat will not support increase moose numbers. A lot of the area is refuge and not available for State predator controls practices. It also has not been proven that predator control through aerial shootings and other methods of killing wolves is effective in increasing the number of wolves.

If habitat improvement is not made to feed additional moose, there is no need to try to increase their numbers through predator control. Suggest leave the balance of nature to take its course.

Roy Catalano

Alaska Moose Harvest 1994-2015





441 West 5th Avenue, Suite 302 | Anchorage Alaska 99501 | tel 907.276.9453 | fax 907.276.9454
www.defenders.org

Alaska Board of Game
ADF&G Boards Support
PO Box 115526
Juneau, AK, 99811-5526

December 22, 2016

VIA ELECTRONIC MAIL

Re: Proposal 155

Dear Board of Game:

Established in 1947, Defenders of Wildlife is a national, science-based non-profit conservation organization. With more than one million members and supporters nationwide, including over 3,500 in Alaska, Defenders is focused on conserving and restoring native fish and wildlife species and habitat throughout the country, including federal conservation system units (CSUs) in Alaska. Wolf control activities authorized pursuant to the above-referenced proposal could impact one such unit, the Kenai National Wildlife Refuge, and the proposal appears to further an aggressive general approach to predator control activities that impacts other CSUs in Alaska.

We encourage you to reject Proposal 155, which would reauthorize wolf control activities in Game Management Unit 15C with the new intent of removing all wolves from the area. Neither science nor other public policy considerations demonstrate that wolf control would be appropriate in GMU 15C.

First, as a procedural matter it is unclear why the Board is considering this proposal at its January meeting in Bethel. We do understand that the Board's meeting cycle changed in 2015, with the effect of moving a previously anticipated Kenai Peninsula meeting from March 2017 to March 2019. We further understand that the currently-authorized wolf control program will expire in June 2017, and thus waiting until March 2019 to consider this issue would mean the Department of Fish and Game (ADF&G) would not pursue wolf control in the interim. For the reasons noted below, however, wolf control appears to be unnecessary and unwarranted in GMU 15C and should not be reauthorized, especially at an out-of-region meeting for no compelling reason. The fact that the current predator control program will expire before the next in-region meeting takes place is not, by itself, a good reason to reauthorize it out of region.

Second, the proposal appears to be unwarranted because current moose population and harvest objectives are being met, and because the available scientific information indicates that moose populations are likely to remain stable or increase. The most recent population work produced a point estimate of 3204 moose, above the 2010 estimate of 2919 animals and toward the high end of the 2500-3500 desired population level



for Intensive Management (IM). The 2016 human harvest was 211 animals excluding roadkill, which has averaged 63 animals annually, a significant additional source of human-caused mortality. 5 AAC 92.118(c). This is above the low end of the 200-350 desired IM harvest range. As ADF&G has reported, moose studies prepared by Thomas McDonough et al. over the past few years in GMU 15C indicate that populations can be expected to remain stable or increase; no decline is anticipated.

Third, it is likely that the harvest could be increased through somewhat less restrictive harvest regulations, which the Homer Fish and Game Advisory Council has noted.¹ The harvest had previously been restricted in order to achieve desired bull:cow ratios and those ratios have improved. But the Board has rejected subsequent proposals by ADF&G to boost harvest by removing additional restrictions that are no longer needed to achieve those management objectives. The Board should not pursue the more expensive and extreme tactic of wolf control while rejecting simpler and far more cost-effective regulatory adjustments that can be fully expected to increase moose harvest.

Fourth, the proposal conflicts with the ADF&G's Intensive Management protocol in at least two important ways. For example, principles 2 and 3 of the protocol call for IM to be science-based and socially sustainable, respectively. The available scientific information suggests no need for a predator control program at all. And it appears that the stakeholder engagement deemed necessary to achieve social sustainability, as noted in Guideline 3.2 of the protocol, has not occurred relative to this proposal. There is no indication of substantial stakeholder participation in developing this proposal, and input from the Homer Advisory Council indicates a high level of stakeholder concern and opposition to it. Thus, in acting out of cycle and region, the Board would be continuing a program that has not been implemented to date and does not have the support of local stakeholders. Swimming against the current of science and public sentiment, the reauthorization is also more extreme than the current program in that it seeks to eliminate all wolves from GMU 15C, while the current program seeks to retain a minimum of 15 wolves. 5 AAC 92.118(c)(2).

Finally, all parties likely understand that the proposed activity is prohibited on national wildlife refuge lands within GMU 15C by Fish and Wildlife Service regulation, and we believe the intent of the proposal is to apply only to non-federal lands. The proposal, however, does not make this explicit, and in fact would delete the current program's clear reference to the need for permission from land managers and landowners, including the Fish and Wildlife Service, Kenai Peninsula Borough, and Alaska Native corporate and tribal landowners, before wolf control activities could commence on those lands. See 5 AAC 92.118(c)(3)(E). If this proposal is adopted to any extent, the Board should specify the relevant areas and provide a map where ADF&G could authorize wolf control activities, so the public understanding is clear. The proposal should also restate the need for landowner permission for activities on non-state lands.

For the foregoing reasons, we urge you to reject Proposal 155.

Sincerely,

Pat Lavin

Patrick Lavin
Alaska Representative

¹ See Homer Fish and Game Advisory Council December 13, 2016 meeting minutes, attached.



**Homer Fish and Game Advisory Committee
December 13, 2016
NERRS Building**

L Call to Order: 6:10 pm by George Matz, secretary. Tom Young (vice chair) took over at 6:20.

II. Roll Call

Members Present: Tom Young (vice chair), George Matz (secretary), Ty Gates, Michael Craig, Jim Meesis, Lee Martin, Dennis Wade, Thomas Hagberg, Doug Malone, Marvin Peters, Wes Humbyrd, Joey Alred.

Members Absent: Dave Lyon (chair), Phillip Jones, Gary Sinnhuber.

Number Needed for Quorum on AC: 8

List of User Groups Present: None

III. Approval of Agenda: Decided to take up ACR proposals.

IV. Approval of Previous Meeting Minutes: NA

V. Fish and Game Staff Present: None

VI. Guests Present: None

VII. Old Business: Brief discussion about BOF meeting.

VIII. New Business: Discussion about Upper Cook Inlet BOF proposals to be discussed at the next meeting.

Alaska Board of Game Arctic/Western Meeting

January 6-9, 2017, Bethel

Alaska Board of Game Arctic/Western Meeting			
January 6-9, 2017, Bethel			
Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
155	Intensive Management Plans IV.		
	0	12	<p>The Homer AC unanimously objects to the BOG's recent acceptance (Oct. 23, 2016) of an Agenda Change Request (ACR) that adds Proposal 155 to its agenda for its January 6-9 meeting in Bethel. We believe that accepting this proposal for the January meeting is an improper use of the ACR process because the action being proposed is not an emergency, hence does not need to be considered out-of-cycle and (worse yet) out-of-region. Given the abbreviated time to submit comments (December 22 deadline), there will likely be little if any public review of this long-standing GMU 15C issue. As we have said before (see attached letter by Dave Lyon, Homer AC chair), this issue needs to have local discussion and input before any BOG decision.</p> <p>While it might be theoretically possible for local residents to attend the Bethel meeting to testify in opposition of this proposal, the time and cost for attending the meeting during this time of the year would be prohibitive for most. Written comments might appear to be another option, but given that ACR's essentially fly under the radar screen so that there is limited public awareness, the very limited time before comment deadline, and that many interested locals were distracted by the Board of Fisheries meeting which just concluded in Homer, this</p>



Alaska Board of Game Arctic/Western Meeting

January 6-9, 2017, Bethel

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
			<p>isn't a reality.</p> <p>According to the BOG's ACR policy (5 AAC 92.005 updated by the board in July, 2015), "boards attempt to give as much advance notice as possible on what schedule subjects will be open for proposals." Furthermore, the ACR "must specify the change proposed and the reason the proposed change should be considered out of sequence." Neither of these important conditions have been met by Proposal 155. Therefore, the ACR that put this proposal on the agenda seems to us to have questionable legal standing.</p> <p>Also, the data provided in Proposal 155 is dubious. It says "Recent population estimates have been within IM objectives, but harvest objectives have not been met in recent years (193 moose harvested in 2015 compared to the 200 moose minimum harvest objective)." The harvest of 193 moose is statistically close to the minimum harvest objective, which could easily be exceeded when bull populations recover (as they are) from very restrictive hunting regulations the past couple of year that were implemented in order to improve bull:cow. This increased harvest will, in essence, nullify the reason for any Intensive Management action. Furthermore, if the known illegal harvest were included in the proposals calculations (Proposal 159 says that from "2013 to 2015 the average reported illegal harvest was 17 percent"), the harvest objective has probably been met in recent years.</p> <p>If the BOG were to consider all feasible options, it might find that reducing the number of brow tines for a legal-sized bull moose from 4 to 3 might create more hunting opportunity and be a more cost-effective to meeting harvest objectives than wolf control.</p> <p>The BOG regulation for ACR's (5 AAC 92.005) says that "the board will not accept an agenda change request that is predominantly allocative in nature in the absence of new information that is found by the board to be compelling." Implementing a 15C wolf control program could be considered allocative, particular when considering that other options (such as reducing the number of brow tines for a legal bull) might be available. The intent of the proposal is to increase moose populations at the expense of wolf populations. Making this choice reduces opportunity for both consumptive and nonconsumptive users who benefit by either trapping of viewing wolves. Accordingly, the decision by the BOG to consider Proposal 155 could be considered a violation of 5 AAC 92.005.</p>



Alaska Board of Game Arctic/Western Meeting

January 6-9, 2017, Bethel

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal

Alaska Board of Game Interior Region Meeting

Feb. 17-25, 2017, Fairbanks

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
159	Hunter education and orientation requirements		
0	12	<p>The Homer AC again unanimously objects to the BOG's recent acceptance (Oct. 23, 2016) of an Agenda Change Request (ACR) that adds Proposal 159 to its agenda for its February 17-25 meeting in Fairbanks. We believe that accepting this proposal for the February meeting is an improper use of the ACR process because the action being proposed is not an emergency, hence does not need to be considered out-of-cycle and (worse yet) out-of-region.</p> <p>While we acknowledge that killing sublegal bull moose is a problem, now that bull:cow are improving, consideration should be given to allow harvest of bulls with three, rather than four, brow tines.</p>	

Meeting adjourned at 7:10 pm

Minutes taken by George Matz

Approved by: Tom Young, vice chair

Date: 12/15/2016



Submitted By
Nina Faust
Submitted On
12/20/2016 9:57:30 PM
Affiliation

Phone
907-235-6262
Email
aknina51@yahoo.com
Address
P.O. Box 2994
Homer, Alaska 99603

I am opposed Proposal 155. This controversial proposal would implement an Intensive Management Plan in Unit 15A through aerial wolf hunting and other means. Residents in Homer opposed a similar proposal in 2011. So far the moose population is sufficiently high that it has not triggered implementation.

Aerial wolf hunting has questionable results and benefits few people. A recent article in the Alaska Dispatch News, <https://www.adn.com/opinions/2016/12/16/alaskas-intensive-game-management-isnt-working/>, states that the program is probably costing around a million annually, producing only about 143 additional moose taken each year at a cost of \$7000 per moose.

The science really does not support these methods, and aerial hunting is a very controversial method of killing wolves. I think our money is being wasted on these types of programs. Science-based habitat management would be a much more useful approach.

ADF&G should be putting forth habitat management programs to improve moose habitat. This is a more sensible approach since it would directly address the problem that is causing the low moose numbers. State biologists should work with Kenai Refuge biologists to determine how best to improve moose habitat. The 1969 fire was a real boon to moose but it has long since grown past its prime benefits for that species.

Habitat is the one of the main limiting factors in moose population decline. Scientific studies have verified that poor habitat is depressing population, and it is not predators that are reducing the bull:cow ratio. To conduct an aerial wolf control program is unwarranted and unscientific. The program would be slaughtering one species to make more moose which would then likely die of starvation. This is not only poor management but is also fiscally irresponsible.

Furthermore, I have real concerns about the safety of aerial wolf hunting in this populated GMU. Aerial shooting and land and shoot methods are both difficult to oversee when members of the public are issued permits to use these controversial methods. Both are open to abuse and with tight budgets, adequate oversight is very unlikely.

Please oppose Proposal 155.

Sincerely,

Nina Faust
P.O. Box 2994
Homer, AK 99603



Submitted By
Stephanie Hartman
Submitted On
12/21/2016 1:18:01 PM
Affiliation

Phone
5099518123
Email
scherrgirl@aol.com
Address
5801 Jordan Circle
Anchorage, Alaska 99504

Regarding the Intensive Management program for Unit 15C; please do not activate this program. I am not in favor of predator control in this region, or my state of Alaska, and hope you choose to manage wildlife will all Alaskans in mind.

Teach value, not vantage, and remember the difference between worth and wealth.

I am an Alaskan, and I am concerned for the future of wildlife in our state. As a devoted mother and Education Director focused on wildlife education and conservation, I am even more concerned for what our governing officials are teaching our future leaders, and even worse, what we may or may not be leaving behind for them.

For too long our state has taken advantage of our wildlife, favoring ungulate species to the detriment of our top predators. For too long our state has ignored the wildlife professionals and enthusiasts that desire wildlife alive, and favored the hunters, trappers, hunting guides and outfitters who view predators as competition. It is time Alaska remembers the true value of all our wildlife populations and that their worth isn't determined solely by dollar signs.

Wolves and bears play a critical role in the structuring of healthy ecosystems. Their presence is crucial to maintaining the array of other animals and plants encompassing their range of habitats. With continued one-sided, consumption-based management, I am certain that wolf and bear populations (especially wolf populations) will continue to decline at rates that will be detrimental not only to their species, but many others as well.

It is the responsibility of our governing bodies to assure that habitat diversity is maintained through natural means, avoiding artificial developments and habitat-manipulation programs, to allow wildlife populations to persist into the future for the benefit of all citizens.

I look forward to the day greater value and more stringent regulations are implemented to conserve wildlife equally; to the day when Alaska's policies reflect the worth of balanced, synergistic wildlife populations far above any monetary wealth that may be gained by their exploitation.

Thank you for your time and work for the state of Alaska.



Submitted By
Marybeth S Holleman
Submitted On
12/22/2016 2:12:15 PM
Affiliation

Phone
19073333381

Email
marybeth.holleman@gmail.com

Address
9138 Arlon St Ste. A-3, Box 666
Anchorage, Alaska 99507

I request that the Board reject proposal 155, IM/wolf elimination in GMU15C, for the following reasons:

1. There is inadequate science to support the elimination of wolves from this portion of the Kenai Peninsula. ADF&G biologists have stated that the moose population in 15C is healthy, the cow to bull ratio is healthy and that area 15C is now at, or near, carrying capacity. As well, numbers of road killed moose, and moose taken illegally, are not adequately considered.
2. There is little local public support for wolf elimination. In fact, the Homer Fish and Game Advisory Committee unanimously opposed wolf predation as a management tool in area 15C.
3. The process by which this was quietly added to the Board agenda at the last minute is suspect and appears to deny public process, and therefore erodes public trust.
4. Taking this up in an out-of-cycle meeting in Bethel, which is not in the region of this proposed predator control, is also suspect, also denies public process, and also erodes public trust in State leadership.
5. IM in such a popular tourism area is certain to corrode the image of Alaska to visitors, and may therefore cost the State money in tourism dollars, while also dealing an economic blow to Kenai Peninsula businesses that, given the State budget crunch, are more vulnerable than ever.
6. The State of Alaska is in a severe budget crunch, and this proposal, given all the above points, is obviously a waste of state monies. Regardless of whether it's paid by hunter fees, this still creates ill will in Alaskans who see such government waste as an affront to the hard times they are experiencing as other valuable services, such as their children's educations, are being cut.

Clearly, this proposal isn't in anyone's interest, and will do far more damage—not just to ecosystem health but to the public's image of the Board and the State government. I urge you to reject it.



Submitted By
Michael Haukedalen
Submitted On
12/22/2016 2:33:56 PM
Affiliation
Alaska state director - The Humane Society of the United States
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Address
PO Box 111591
Anchorage, Alaska 99511-1591

Alaska Department of
Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Re: Alaska Board of Game's Proposal 155: Complete Removal of Wolves on Public and Private Lands within Game Management Unit 15C

Board Members:

On behalf of The Humane Society of the United States ("The HSUS"), the nation's largest animal protection organization, and our Alaska supporters, we submit comments opposed to the Alaska Board of Game's proposed wolf-control program for the area north of Kachemak Bay with the purpose of removing "all wolves" from "public and private lands within the control area (15C north of Kachemak Bay)."^[1] We strongly oppose Proposal 155 for the reasons that follow.

1. The Board of Game's (BOG's) own science in support of the Proposal is not definitive, and contradicts other peer-reviewed research.

BOG's Intensive Management policies have resulted in widespread removals of native carnivores, including rather alarming reductions in Alaska's grizzly bear populations ([Miller et al. 2011](#)). The BOG's "Intensive Management" policies are politically motivated and not based upon the best available science ([Haber 1996](#), [Miller et al. 2011](#)).

The effect of human persecution of carnivores is often "super additive," meaning that hunter kill rates on wolves, grizzly bears, and other carnivores have a multiplier effect on the ultimate increase in total mortality over what would occur in nature due to breeder loss and pack disruption, and its indirect effects including increased infanticide and decreased pup recruitment ([Creel and Rotella 2010](#), [Bryan et al. 2014](#), [Ausband et al. 2015](#), [Darimont et al. 2015](#)). With the loss of top carnivores, ecosystem structure and function is disrupted, resulting in the "trophic downgrading of planet earth" ([Estes et al. 2011](#), [Ripple et al. 2014](#), [Ripple et al. 2016](#)).

The scientific consensus for the last several decades has generally concluded that carnivores modulate prey populations and make them more vigorous ([Murie 1940](#), [Peckarsky et al. 2008](#), [Mitchell et al. 2015](#)), including removing the sick and weak animals who would die of other natural causes anyway ([Pierce et al. 2012](#), [Monteith et al. 2014](#)). That is why predator-control schemes are an unreliable means of increasing the abundance of ungulates ([National Research Council 1997](#), [Bishop et al. 2009](#), [Hurley et al. 2011](#)). The best available science indicates that widespread elimination of bears, coyotes and wolves is unlikely to make ungulate herds rebound ([National Research Council 1997](#), [Hurley et al. 2011](#), [Mitchell et al. 2015](#), [Prugh and Arthur 2015](#)).

The scientific literature clearly shows that food resources ultimately limit the numbers of large herbivores (e.g., [Monteith et al. 2014](#), [Mitchell et al. 2015](#)). Ungulate survival is absolutely reliant on their ability to gain access to adequate nutrition—but that nutrition can be hindered by myriad causes. In Alaska, migration is an important means for ungulates to obtain better nutrition and avoid predation ([White et al. 2014](#)), but oil fields and roads inhibit connectivity between subpopulations of ungulate herds, creating genetic divisions and limiting reproduction ([Haskell et al. 2006](#), [Wilson et al. 2015](#)). The oilfields in Alaska, with their constant vehicular movement and vehicle-animal collisions, are harmful to caribou reproduction ([Haskell et al. 2006](#)). Furthermore, a warming planet is leading to the decline of both caribou and reindeer, which harms northern indigenous peoples ([Vors and Boyce 2009](#)).

Ungulate populations in portions of the United States have experienced declines over the latter part of the last century because of habitat loss or fragmentation, changes in forage quality, competition with invasive ungulates, predation, disease, hunting, poaching, stochastic weather events, fire suppression, noxious weeds, competition with domestic livestock, energy development, and changes in hydrology



caused by global warming—including changes in snow pack and temperature (e.g., Forrester and Wittmer 2013, Monteith et al. 201

Ungulate declines are not unique to Alaska.

The most current and best available science is clear: predator-control measures intended to restore ungulate herds, such as moose and caribou, are doomed to fail because herds need access to adequate nutrition—their main limiting factor. Alaska’s many-decades-long “Intensive Management” program has failed to yield more ungulates for human hunters, and it is the wrong approach to conserving natural systems.

2. The Proposal caters to special interests, and does not utilize the resources at issue for the maximum benefit of “the people,” in contravention with Article 8 of the Alaska Constitution.

Section 8 of the Alaska Constitution plainly states that “[t]he legislature shall provide for the utilization, development, and conservation of all natural resources . . . for the maximum benefit of the people.” According to the Alaska Department of Fish and Game (“ADF&G”) web site, ADF&G’s mission is to “manage use in the best interest of the economy and the well-being of the people of the state.”

Alaska hunters represent a small minority among “the people” of Alaska. ADF&G issued 103,000 resident hunting licenses in 2015, when the state’s population totaled 738,000. Therefore, approximately 14% of Alaska residents are hunters. Both Alaska’s Constitution, and ADF&G’s own mission, explicitly require fidelity to “the people” of the state – not the special interests of the small minority of Alaskans who purchase hunting licenses.

ADF&G’s seven member BOG is the state’s regulatory authority “to conserve and develop Alaska’s wildlife resources.” Each member of the current BOG self-identifies as a hunter; three members have a pecuniary interest in hunting issues and regulations. As hunters represent a small minority of Alaska residents, a truly representative BOG would consist of six “non-consumptive users” and one hunter. Alaska’s BOG consistently fails to consider the interests of “the people,” but rather, caters to the special interests of hunters. Again, this is both a violation of the state constitution, and contrary to ADF&G’s own mission.

A 2016 poll conducted by the Remington Research Group provides objective evidence that refutes the false narrative that most Alaskans agree with ADF&G’s management of wildlife resources. The poll found that a clear majority of 1,400 Alaska voters disapprove of a set of four of the cruelest and most unsporting hunting practices ADF&G permitted on Alaska’s National Wildlife Refuges (bear baiting, denning, aerial scouting, and the use of steel leghold traps).

[see: http://www.humanesociety.org/news/press_releases/2016/03/alaska-nwr-cruel-practices-030116.html]

The non-hunting majority of Alaska residents enjoy a protected interest in Alaska’s wildlife resources. These interests are consistently ignored by ADF&G and the BOG. Proposal 155 imperils non-consumptive residents’ constitutionally protected right to (for example) observe or photograph wolves in their natural abundance, by pursuing state-sanctioned slaughter of “all wolves” throughout GMU 15C.

In Conclusion:

We strongly oppose Proposal 155 and the removal of all wolves from GMU 15C. Independent studies refute the Department’s own science purported to support IM practices. And the Proposal is not in accordance with the Department’s requirement to represent the resource interests of all Alaskans – not the demonstrably small minority of Alaskans that are consumptive users.

Finally, an Alaska wildlife biologist researched ADF&G Annual Reports from 2012-2015. His inquiry into the costs of Intensive Management of wolves in the Upper Tanana/Yukon revealed a cost of \$12,790 per wolf killed in 2013. And in the Koyukuk (GMU 24B) a cost of \$12,692 per wolf killed during 2012-2015. IM costs statewide are in excess of \$1 million per year. Even if the Board is not persuaded by our more detailed commentary, Proposal 155 represents an unnecessary and unconscionable expenditure in the midst of Alaska’s devastating fiscal crisis.

Sincerely,

Michael Haukedalen

Alaska State Director for The Humane Society of the United States

[1] Map at <https://www.adfg.alaska.gov/static/regulations/wildliferegulations/pdfs/gmu15.pdf>.



From: Roger Kaye
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposal 155
Date: Thursday, December 22, 2016 8:55:47 AM

I have been a hunter in Alaska for 40 years now, and from that perspective I'd like to ask the BOG to reject Proposal 155, specifying intensive predator control in GMU 15C. Such proposals that vilify wolves are a disgrace to the tradition of real hunting. Predators are part of the natural system that many of us participate in through hunting. As well, such programs reflect badly on Alaska.



From: Frank Keim
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposal 155
Date: Thursday, December 22, 2016 7:27:13 AM

In reference to Proposal 155

I've been a resident of Alaska for 55 years and would like to express my extreme disappointment and, yes, outrage concerning the Alaska Board of Game's Proposal 155 to kill wolves in District 15C north of Kachemak Bay on the Kenai Peninsula. The motive for doing this is to increase the population of moose in the area for urban hunters. The bogus concept of reallocation has raised its ugly head here (although there were only 7 fewer moose harvested this year than last in the area) and is being used to justify the proposal and possibly the extension of the concept universally throughout the State.

This proposal also flies in the face of statistics presented in an op-ed in the ADN recently by biologist and former member of the Board of Game, Vic Van Ballenberghe, that clearly indicate that in spite of extreme predator control of wolves and bears in other parts of Alaska, moose populations have not risen anywhere in proportion to the number of wolves and bears killed by the State.

Based on these statistics and the bogus use of the concept of reallocation, I ask the Board of Game to reconsider and reject the aggressive (and regressive) policy of intensive management that they instituted in 2002, including the idea of reallocation. This should begin with rejection of Proposal 155 to shoot and kill wolves on the Kenai Peninsula.

Thank you.

Frank Keim
2220 Penrose Lane
Fairbanks, Alaska 99709

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Never doubt that a small group of thoughtful, committed citizens can change the world; indeed, it's the only thing that ever has. -- Margaret Mead



From: Jim & Suzanne Kowalsky
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comment on Proposal # 155
Date: Wednesday, December 21, 2016 11:14:18 PM

COMMENT ON PROPOSAL 155

Submitted to the Alaska Board of Game by Jim Kowalsky for the record on December 20, 2016

I wish to comment on the last minute proposal #155 for the record.

This proposal should be rejected.

The number of moose harvested is not a valid justification for removing wolves.

Wolves are natural predators and have a valuable role to play in maintenance of healthy ecosystems.

I am made aware of ongoing evidence of deterioration of habitat as the principal factor, seemingly ignored in this proposal.

I am aware that similar habitat condition as cause were factors in the rejection of a similar proposal in 2012.

I am aware of a significant unlawful harvest of bull moose and I feel this must be quantified and must be factored into any consideration of proposal 155.

I believe hunter education and also enforcement of hunting regulations should be regulation and promulgated for the Kenai.

I believe habitat improvement should be promoted for this area as an element of Intensive Management to be applied instead, and you need start now.

I note Board venue for board action on 155 is Bethel, far from the Kenai and thus removes opportunity for affected residents to participate directly.

This location makes a mockery of the self praise of the democratic process accorded to the regulatory process.

I believe the removal of natural predators plays directly into the charge that the Alaska Board of Game incrementally moves to the creation of moose and caribou monoculture-like wildland game hunting farms.

Your board Mr. Spraker, and you, will likely discard this observation.

I urge you begin to take these criticisms seriously because your board has earned this reputation. **IT WILL STICK.**

You and yours make mockery of the Alaska Constitution's direction that all Alaskans are stakeholders as you continue to dismiss the non consumptive requests put before you.

It is not our record.

The record, yours and the board's, stains Alaska's reputation.

Here is an opportunity to show some balance by rejecting 155, a flawed proposal, a mockery of fact and of a democratic process.

I urge you take a broader view and reject.

Thank you.

Jim Kowalsky

POBox 10640

Fairbanks, Alaska



From: Mark Luttrell
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Citizen comments on BOG proposal 155
Date: Tuesday, December 20, 2016 5:20:15 PM

Board of Game and ADFG members

I understand that proposal 155, aimed at eliminating all wolves in GMU 15C, is before you. Good public policy should include public hearings regarding sensitive and controversial issues. Eliminating wolves in a well known and loved area creates a controversy. Residents of the Kenai Peninsula would be well served if an explanation accompanied the proposal. Without an explanation, and in light of the recent scrutiny of the failed IM program throughout Alaska and the dim view of State wildlife management, residents are left skeptical and uninformed.

Will you bring this before the public in a forum separate from BOG proceedings?

If you won't bring it before those you serve, at least consider my comments on proposal 155:

First. Eliminating wolves does not correlate with increased number of moose.

Second. Decimating local wolves to satisfy a select and small group of Alaskans (hunters) is not in the best interest of the state. Most Alaskans are not hunters and by far the majority love to see and photograph wildlife. A thriving, sustainable tourist industry relies on seeing wolves and other wildlife.

You all may be too close to it to realize, but Alaska has a poor reputation for wildlife management. Advancing a program that will remove all wolves will only further tarnish the reputation of the Board of Game, the ADF & G and the state itself.

Mark Luttrell
Seward



Submitted By
Sean McGuire
Submitted On
12/20/2016 9:29:26 AM
Affiliation

I'm writing today regarding the proposal by Alaska Department of Fish and Game to kill every single wolf in Game Unit 15C. What in the world are these people thinking? All this talk about valuing species that we have been hearing from ADF&G and the Board of Game. Well now let's see if all that talk is real. I have never seen such a blatant attack on one of Alaska's iconic animals. This will be a nasty fight and if it goes through it will be a black eye on a nationwide level. Apparently 20% of male moose taken in this unit are illegal because the hunters are too greedy or ignorant to know what a legal moose is. So in all their wisdom the idea is to make the wolves pay with their lives. This is absolutely beyond the pale and I think it will be seen by the public as a scandal.

Thank you,

Sean McGuire.



Submitted By
Douglas McIntosh
Submitted On
12/22/2016 8:46:09 PM
Affiliation
Alaskans FOR Wildlife

Phone
907 479-6827
Email
ffdjm@alaska.net
Address
2208 Nottingham Drive
Fairbanks, Alaska 99709

Regarding Intensive Management for Unit 15C:

Vic van Ballenberghe's recent post in the Anchorage Dispatch News shows that on the average IM has no effect on moose harvest and the BOG is wasting \$7000 per each wolf killed. I say moose harvests 7 below the minimum harvest objective does not justify drastic measures like aereal wolf hunting.



Submitted By
Rika Mouw
Submitted On
12/21/2016 3:58:58 PM
Affiliation

Dear Board of Game Chairman Spraker,
Regarding Proposal 155 5 AAC 92.108 Identified big game prey populations and objectives and 5 AAC 92.118. Intensive Management Plans IV it concerns the public greatly to see State funds used for politics, such as predator control, especially when the State is in the midst of a multi-billion deficit, with no real solution in sight.

It is egregious to propose a program that does not have the 1) science to back it up, 2) local public support for it, or 3) viable arguments to substantiate it.

In addition, to renew the predator control program aspect to proposal 155, while the BOG meeting is held in Bethel out of cycle, further erodes public trust in State leadership and viability in public policy. The proposal for 15C especially plays very badly in the local public's image both for residents and visitors alike.

The Homer Fish&Game Advisory Committee unanimously opposed wolf predation as a management tool in area 15C. ADF&G biologists have stated that the moose population in 15C is healthy, the cow to bull ratio is healthy and that area 15C is now at, or near carrying capacity.

Has the predator control form of intensive management worked in the past? The science and numbers do not substantiate it. Since there were no state aerial wolf kills in area 15C as proposed in 2012 and with moose numbers being healthy, there are no numbers to support the renewal of predator control or the expenditure for it. ADF&G has recommended less restrictive harvest regulations, which have not been implemented by BOG. There has also been an increased number of illegal takes in recent years. Also, road kills have not been included in harvest statistics by the BOG when considering intensive management considerations (61 average for area 15C). It is time for the State to explore ways to address the serious public policy issues. The IM plan includes habitat enhancement as well as hunter education. Holding hearings on the application of intensive management would be the first step in this process. The predator control program is costly and it reflects politicking rather than serious policy.

The BOG's idea of re-allocating moose from natural predators to hunters is not only a very bad concept, it is conjecture and truly does create a bad image. The totality of this proposal poorly serves the public, especially in a time of extreme state deficits and low credibility. It is time to re-evaluate state priorities.

I strongly urge you to cut this wasteful spending and to recognize the many values of wildlife and the diverse users of Alaska's wildlife in this state.

Sincerely,

Rika Mouw
P.O. Box 4084
Homer, Alaska 99603



Submitted By
Patricia OBrien
Submitted On
12/22/2016 8:14:41 PM
Affiliation

~~Re: Alaska Board of Game's Proposal 155: Complete Removal of Wolves on Public and Private Lands within Game Management Unit 15C - strongly oppose

This is a rushed proposal without an author's name and shocking verbiage. The Department of Fish and Game determination to remove all wolves from public and private lands in Unit 15 C when ADF&G previously told the Board of Game that wolf predation was not limiting Kenai moose. Poor habitat was the issue. This proposal represents a mockery of sound science. I have reviewed the comments of Michael Haukedalen on this proposal and completely agree.

The only credible action that can be taken on this proposal is opposition.



Submitted By
Rick Steiner
Submitted On
12/21/2016 7:11:37 AM
Affiliation
independent biologist

I ask that the Board decline proposal 155, which seeks to conduct Intensive Management (wolf elimination) on a large portion of GMU 15C (Kenai Peninsula). I seriously question the process by which this proposal was quietly added to the Board agenda at the last minute by ADFG, and the veracity of the science behind the proposal. Clearly the department's moose data are insufficient, and the target moose harvest should simply be adjusted downward from the minimum of 200. As it is, the harvest last year was only 7 shy of that target.

As is often the case, wolf predation is being blamed for ungulate population dynamics when many other factors are together more significant. If the Board wishes to conduct IM in the area, I request that it be done with non-lethal measures, rather than lethal measures. This is entirely permissible under the IM statute, and worked well previously. Please see our joint letter to the Governor on this matter in August (below).

[The Commissioner declined our reasonable request, using inaccurate information: http://www.newsminer.com/news/local_news/fish-and-game-commissioner-rejects-changes-to-predator-control-methods/article_3b6b3cb8-8d30-11e6-ad05-93ac67f8873d.html]

August 15, 2016

Honorable Bill Walker, Governor

State of Alaska

Office of the Governor

P.O. Box 110001

Juneau, AK 99811-0001

RE: Requested adjustments to State of Alaska predator control/Intensive Management program

Dear Governor Walker,

Over the past 13 years, lethal predator control/Intensive Management (IM) in Alaska has expanded dramatically. A graphic display of the increase in predator control areas in Alaska from 2001 - 2014 can be found here:

<http://unbearableterms.tumblr.com/post/72770119451/predator-control-areas#.V5U5kTV5-8A>

The Alaska Department of Fish & Game (ADFG) reports that each year, Alaska predator control programs directly kill approximately 200 wolves, 150 black bears, and 10 brown bears. However, this total does not include the number of pups and cubs that die after being orphaned by the program, nor does this total reflect the increased predator harvest that has resulted from the liberalization of predator take regulations, including liberalization/elimination of bag limits, significant extensions of hunting/trapping seasons for predators, elimination of brown bear tag requirements, baiting/snaring of bears, permitting the take of sows with cubs, permitting use of helicopters to run IM trap lines and bear snare sets, and so on. Clearly, the actual kill in Alaska's predator control/IM program is significantly larger than the total reported.

Alaska's lethal predator control/IM program, as currently practiced, is unscientific, unnecessary, ineffective, costly, unethical, inhumane, and controversial.

Accordingly, we the undersigned Alaska citizens, respectfully request that you make three important and reasonable adjustments to Alaska's predator control/IM program, as currently conducted by ADFG:

- 1. Replace lethal predator control methods with non-lethal methods;**
- 2. Terminate the "collaring for later control," or "Judas wolf" program;**
- 3. Prohibit all IM within 5 miles of federal conservation units.**

As discussed below, you have the authority, indeed the responsibility, to order such adjustments in this state program.

I. Replace lethal predator control methods with non-lethal methods.

We recognize that state statute provides authority for IM programs, but statute and regulation do not prescribe what techniques must be used for such.

State law and regulation (5 AAC 92.110 and 115) provide the following IM authority to the ADFG commissioner:

The commissioner or the commissioner's designee, including contracted agents of other governmental agencies, may reduce [wolf and bear] populations in an efficient manner, by any means, but as safely and humanely as practical, including the use of a helicopter.

While the state explicitly *prohibits* use of certain methods in its lethal predator control program (e.g., machine guns, bombs, explosives, pits, fire, smoke, electronic night vision scopes, expanding gas arrows, etc.); and generally *authorizes* use of all other methods (lethal and non-lethal); it does not affirmatively *require* use of any specific method. Notably, nowhere does statute or regulation require the use of *lethal vs. non-lethal* methods for predator control/IM.

For instance, while 5 AAC 92.110 *authorizes* the department to lethally gas wolf pups in dens using carbon monoxide, and to otherwise kill pups in dens ("denning") in predator control areas (with the approval of the commissioner), it does not *require* such. And while poison is *authorized* to kill predatory animals (AS.16.35.200), written permission is required from the Board of Game.

Similarly, while statute and regulation *authorize* the use of state employees, helicopters, and other equipment in IM, AS 16.05.783 (e) prohibits such without direct approval of the commissioner:

The use of state employees or state owned or chartered equipment, including helicopters, in a predator control program is prohibited without the approval of the commissioner.

We further note in 5 AAC 92.110 (control of predation by wolves) and 5 AAC 92.115 (control of predation by bears) the following:

After the board has adopted a predation control implementation plan, the commissioner may, at any time during the period for which the plan is in effect, determine whether to implement the plan and may, by regulation, amend the plan to apply additional restrictions in light of circumstances existing at the time of implementation.

Clearly, implementation and/or amendment of IM plans, including methods to be used, remains within the discretionary authority of your administration.

On this point, we note that during the administration of former Governor Tony Knowles, IM was successfully implemented using *exclusively* non-lethal methods (e.g., translocation, sterilization, diversionary feeding, habitat enhancement through wildfire policies, etc.). These non-lethal methods represent effective alternatives to the lethal control methods.

There are numerous problems with Alaska's current lethal predator control/IM programs, including that they:

- Are based on poor science and inadequate predator/prey population surveys;
- Are not scientifically peer reviewed;
- Do not recognize or protect natural variability of dynamic ecosystems;
- Do not account for the growing ecological impacts of climate change;
- Are designed for mostly urban, not rural subsistence, hunters;
- Are not supported by many Alaska citizens;
- Can result in prey populations exceeding habitat carrying capacity, thus degrading habitat;
- Can lead to unintended consequences, including increasing predation due to immigration of predators into control areas;
- Prioritize consumptive use of wildlife over non-consumptive use, contrary to the Alaska constitution; and
- Produce little scientific evidence that the programs are effective.

It is time for reputable, professional wildlife scientists in ADFG to admit such, and provide scientific leadership on this issue to the Board of Game and commissioner.

Further, it is clear that the state's lethal predator control program is currently financially supported in large part through the federal Pittman-Robertson "Federal Aid in Wildlife Restoration" program. This federal program contributes the single largest component of the annual budget of the ADFG Division of Wildlife Conservation. Although the state maintains that its federal aid accounts do not reflect direct support to actual IM operations, it is apparent that lethal control is indeed being supported, inappropriately, with these federal funds (e.g. collaring for later control, as discussed below). In addition, most of the state's funding for survey and inventory monitoring, and assessment of impacts of the lethal predator control program, derives directly from these federal wildlife restoration funds.

As you know, the U.S. Fish & Wildlife Service is now drafting a new proposed rule to clarify whether such uses by states are permissible, and the U.S. Department of Interior Inspector General is preparing to conduct an audit of the past use of these federal funds by the State of Alaska, paying specific attention to this issue of funds used for lethal predator control. The continuation of the lethal predator control program, with support by these federal wildlife restoration funds, jeopardizes the continuation of this substantial funding source to state wildlife management.

Finally, as aerial lethal control involves chasing and often wounding wolves and bears from aircraft, this can cause significant suffering of animals. As such, this practice violates the state legal requirement to conduct predator control "as humanely as practical." While "humane" is not defined in statute, it is generally taken to require compassion, kindness, and sympathy for animals; and to require that actions cause the least possible harm, pain, and suffering. The practice of chasing, shooting and wounding wolves and bears from aircraft does not meet this legal requirement of humane treatment.

In addition, bear baiting/snaring conducted in GMU 16 is exceptionally cruel and inhumane, as snared bears can struggle and suffer painfully for days before succumbing or being killed.

Governor, you and your ADFG commissioner clearly have the authority to substitute *exclusively* non-lethal IM methods for the lethal methods now in use. The IM surcharge you approved this year can be used to support the non-lethal IM effort. Non-lethal IM will effectively sustain ungulate populations for human harvest, will comply with statute, and will increase public acceptance of state wildlife management.

For the above reasons, we request that you order the substitution of humane, non-lethal predator control options for all lethal control options now in use.

II. Terminate the “collaring for later control,” or “Judas wolf,” program.

Secondly, we ask that you terminate the practice of “Judas wolf” collaring/killing.

As you know, this program places tracking collars on wolves, and then state gunners track the collared wolves back to their family group/den, where as many as possible are then killed by state biologists. The “Judas” animals are often spared in order to lead state gunners to other wolves for elimination.

We note the following in July 7, 2016 correspondence from Bruce Dale, Director of the ADFG Division of Wildlife Conservation:

A total of 28 wolves were fitted with radio collars since 2005 in the Upper Yukon–Tanana wolf control area. This is the only area where radio-collared wolves have been used to locate wolves during a wolf control program. These wolves were all radio-collared between fall 2011 and spring 2016 (Regulatory years 2011 through 2015; RY11–RY15). A total of 179 wolves were killed by ADF&G during RY11–RY15 in this wolf control program.

We estimate that approximately 30% of wolves killed by ADF&G in the Upper Yukon–Tanana wolf control area in the last 5 years were associated with collared wolves.

Wolves serve a critical role in terrestrial ecosystem stability, and are intelligent, social animals, with strong family bonds. We find it reprehensible that this very sociality and family bond is being lethally exploited in state predator control efforts.

This program adds another layer of concern regarding the inhumane killing of wildlife from helicopters. The program also raises legal questions regarding compliance with FCC licensing of airwaves used for tracking, as well as NEPA compliance.

The “Judas wolf” collaring/killing program is unethical, inhumane, an embarrassment to Alaska, and should be ended immediately.

III. Prohibit all IM within 5 miles of federal conservation units.

Finally, we ask that you prohibit all state predator control/IM programs (lethal or non-lethal) within 5-miles of any federal conservation unit - National Parks, National Preserves, National Wildlife Refuges - to minimize impact on wolves and bears from these conservation units and the consequent erosion of ecological integrity of these national interest lands.

On this point, we note that over the past decade, state IM programs have targeted and eliminated most wolf family groups (packs) from Yukon-Charley Rivers National Preserve, including most of those collared for federal research programs. As a result, the Park Service now concludes that the Preserve is “no longer in a natural state,” and there are not enough survivors in the Preserve to maintain a “self-sustaining population.” In a 5-year period, state IM efforts have killed 90 Preserve wolves from nine packs, and terminated the 20-year federal wildlife research program.

As example in 2013, all 24 members of Yukon Charley’s Seventymile Pack, including two with radio collars, were shot by ADFG-authorized private airplane gunners, eliminating the pack altogether. In 2012 and 2014, ADFG helicopter gunners shot all 19 members of the Lost Creek Pack, including two collared animals, eliminating that pack as well. And in March 2016, state helicopter gunners shot and wounded a female Yukon Charley wolf along the boundary of the Preserve, and then pursued the wounded animal into the Preserve, where they illegally killed her. Of the 18 other wolves killed by state predator control in this area this spring, half were young of the year.

Yet despite the state IM program, calf survival in the Forty Mile Caribou herd has not increased in the past 5 years.

State predator control on the boundaries of federal conservation units is causing significant harm to the ecological integrity of these federal lands, it isn’t achieving the stated goal, and it further erodes the state-federal relationship. This practice needs to end.

In conclusion, the manner in which we conduct our activities, including how we manage and treat our wildlife, is an important reflection of who we are as a society.

Throughout the Murkowski, Palin, and Parnell administrations, Alaska’s predator control programs have grown more aggressive, inhumane, costly, unscientific, ineffective, and unacceptable to most Alaskans. These lethal predator control programs seriously tarnish the image and reputation of Alaska, which in turn poses risk to our sustainable tourism industry.

As you are aware, the National Park Service and U.S. Fish & Wildlife Service have recently published rules restricting lethal predator control on these federal conservation units in Alaska. This welcome federal action reflects a growing national sentiment that such lethal IM programs are inappropriate, and should be ended.

Unfortunately, your administration has, so far, continued aggressive, lethal predator control/IM on other lands in Alaska.

Governor, we are better than this. We need new "rules of engagement" in Alaska's predator control program.

The reasonable adjustments we request here present an opportunity for you to restore responsible wildlife management in Alaska, sustain ungulate populations for human consumption, and honor your commitment to represent the interests of *all* Alaskans.

As a way forward, we encourage you to convene an independent, science-based *Intensive Management Working Group* to examine these, and other such proposals.

We look forward to your positive response.

Very Respectfully,

Vic Van Ballenberghe, Anchorage

Joel Bennett, Juneau

Frank Rue, Juneau

R.T. Wallen, Juneau

Barbara Brease, Healy

Jim Ayers, Juneau

Edward Schmitt, Soldotna

Marybeth Holleman, Anchorage

James Kowalsky, Fairbanks

Mark Luttrell, Seward

Ken Green, Cooper Landing

Anne Coray, Port Alsworth

Nick Jans, Haines

Frank Keim, Fairbanks

Kate Thomas, Cooper Landing

James Kowalsky, Fairbanks

Roger Kaye, Fairbanks

Joan Frankevich, Girdwood

Duane Howe, Homer

Bill Sherwonit, Anchorage

Josh Klauder, Talkeetna

Kaylene Johnson-Sullivan, Eagle River

Johnny Johnson, Anchorage

Jeremiah Townsend, Healy

Jim Hunter, Fairbanks

Kneeland Taylor, Anchorage

Gerald R. Brookman, Kenai

Susan Olsen, Anchorage

Larry Edwards, Sitka



Jill Wittenbrader, Kodiak
Wayne Hall, Anchorage
Nancy Kuhn, Fairbanks
Michelle Wilson Nordhoff, Anchorage
Frances Inoue, Anchorage
Rika Mouw, Homer
Carol Archuleta, Fairbanks
Nicolene Jordan, Palmer
Sean Maguire, Fairbanks
Sharon Aiden, Fairbanks
Philip S. Marshall, Fairbanks
Janet Lokken Marshall, Fairbanks
Nina Faust, Homer
Fran Mauer, Fairbanks
Yoriko Freed, Fairbanks
Soren Wuerth, Girdwood
Connie Brandel, Anchorage
Katharine Richardson, Fairbanks
Scott Chesney, Two Rivers
Richard Hellard, Juneau
Kim Behrens, Anchorage
Jeffrey Merkel, Fairbanks
Marin Kuizenga, Fairbanks
Matteo Kuizenga, Fairbanks
Annika Merkel, Fairbanks
Laurie Daniel, Homer
John Gaguine, Juneau
Tara Walker, Anchorage
Jeanette Hanneman, Big Lake
Tima Priess, Ester
Hugh Rose, Fairbanks
Cheryl Silcox, Anchorage
Milli Martin, Homer
Lori Hanemann, Fairbanks
Catherine A Allen, Juneau
Ellen Wolf, Talkeetna
Timothy C. Lescher, Anchorage



George Harbeson, Homer
Ed Davis, Fairbanks
Stephanie Hartman, Anchorage
Suzanne Kowalsky, Fairbanks
John Brieby, Wasilla
Brian Luenemann, Anchorage
Amanda Motonaga, Soldotna
Patricia OBrien, Juneau
John Stone Porter, Talkeetna
Larry Casey, Eagle River
Carol Biggs, Juneau
Nancy Bale, Anchorage
Terry Cummings, Anchorage
Dorothy Thompson, Fairbanks
Barbara Frazer Reed, Palmer
Steve Kahn, Port Alsworth
Yasushiro Ozuru, Anchorage
Marius Panzarella, Anchorage
Sylvia Panzarella, Anchorage
Susan Hansen, Fairbanks
Linda Shaw, Juneau
Kathryn L. Recken, Cooper Landing
Cathy Gillis, Anchorage
Mary Bethe Wright, Anchorage
John N. Vanderhoff, Cooper Landing
Michael Haukedalen, Anchorage
Dean Cornett, Cooper Landing
Nina Cornett, Cooper Landing
David L Plant, Palmer
Matt Felix, Juneau
Aran Felix, Juneau
David Beebe, Kupreanof
Keri Gardner, Anchorage
Lin Davis, Juneau
Maureen Longworth, Juneau
Rebecca Knight, Petersburg



Susan Scherwin, Girdwood
Martha Smith, Petersburg
Bill Watkins, Denali Park
Kristine Hutchin, Eagle River
Greg Tibbetts, Anchorage
Jane Tibbetts, Anchorage
Scott Bailey, Eagle River
Karen Cameron, Anchorage
Dave Plant, Palmer
Penelope Wells, Anchorage
David Janka, Cordova
Roger Elkins, Cooper Landing
Kari Gardey, Anchorage
Paul Chanek, Chugiak
Karen Lester, Chugiak
Robyn Lauster, Anchorage
Rob Hodge, Anchorage
Elizabeth Hatton, Anchorage
Rebecca Noblin, Anchorage
April Warwick, Anchorage
Clare M. Hiratsuka, Anchorage
Peggy Mullen, Soldotna
Maxine Franklin, Wasilla
Jan Myers, Anchorage
Juliette Boselli, Denali Park
Nancy Podgorski, Wasilla
Laura E. Davidson, Eagle River
William M. Dotson, Anchorage
Sean Rice, Kenai
Robin H. Scheff, Anchorage
Linda Boggs, Eagle River
Jill Garnet, Kasilof
Joan Galt, Anchorage
Paul Joslin, Anchorage
Michelle Anderson, Juneau
Yolanda De la Cruz, Anchorage



Lynn Mitchell, Palmer

Beverly Cross-Cason, Anchorage

Stefanie Miller, Anchorage

Karen Dechman, Anchorage

Whitney Youngman, Anchorage

Lia Keller, Anchorage

Jerry Garden, Anchorage

Kristen Cassens, Girdwood

Jacquelyn Briskey, Chugiak

Jeffrey Harvey, Palmer

Holly Stanger, Nikiski

Rick Steiner, Anchorage



From: Kneeland Taylor
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Cc: [Cotten, Sam R \(DFG\)](#)
Subject: BOG COMMENTS
Date: Thursday, December 22, 2016 11:45:31 AM

LAW OFFICE OF KNEELAND TAYLOR, P.C.

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December 22, 2016

Board of Game
P.O. Box 115526
Juneau, AK 99811
BY EMAIL: dfg.bogcomments@alaska.gov

To the Members of the Board of Game:

It is my understanding that you will take up the issue of wolf control and bear control ON THE KENAI PENINSULA at your meeting in Bethel, in January, 2017. I understand that the issue is whether wolf control and bear control should be reauthorized.

I oppose wolf and bear control on the Kenai Peninsula.

There has been a large fire recently on the Kenai Peninsula, and the fire has vastly improved habitat for moose. Moose numbers are on the increase, but apparently hunters haven't taken as many moose (and of the appropriate gender) as the Department wishes.

Management only for steady, high rates of hunter success disregards the wildlife itself, and has unanticipated negative



consequences. We have seen this with declining Dall Sheep populations, smaller bears on Kodiak island, and coyotes moving into areas where wolf numbers have been dramatically reduced. Extreme predator control is not the answer to fluctuating hunter success rates, and predator control on the Kenai Peninsula is extreme.

Very truly yours,

Kneeland Taylor



Submitted By
Timothy
Submitted On
12/20/2016 11:14:29 PM
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Alaska citizen

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I am not going to begin my statement by brandishing how many years I have lived in Alaska, in an attempt to insinuate that my opinion is more important than someone else's opinion because of my tenure in this state. In the realative scheme of things, I am new to the state. I have, however, lived in 5 other states for significant periods of time. I have worked for several state and federal fisheries and wildlife agencies while living in those states, including Alaska Department of Fish and Game. What strikes me most by this new porposal 155 to adopt intensive management in area 15C, is that the BOG is basing a decision on this matter on data that is over a year old. I would expect a diligent legislative body to wait a few days until the 2016 moose harvest data is available, and then make a more educated decision.

The other issue I have found with the way our own BOG operates, as opposed to wildlife boards in other states I have worked in, is that the Alaska BOG has increasingly been using predator control as a default. This practice is dated, and it only allows for immediate gratification. Killing the wolves may intitially increase the moose numbers, but the population will soon reach it's carrying capacity, and then plummet to extreme lows due to lack of resources in the absence of natural predation.

A further consideration, is that management unit 15C is adjacent to both Kenai Fjords National Park, and Kenai National Wildlife Refuge. The National Park is one of Alaska's greatest tourist draws, and upwards of 300,000 visitors visit the Park each year. If the Alaska Department of Fish and Game and its BOG wants to see the protected wildlife within the Park continue to thrive and draw tourist dollars, it would be in their best interest to not allow intensive management in unit 15C. Wolves may have vast home ranges, and do not adhere to Park boundaries. This makes them extremely suceptible to anthropogenic and unsportsmanlike control outside of Park borders that otherwise grant them protection. It is in the economic interest of the people of the Kenai peninsula, many of whom depend on tourist dollars, for ADFG to manage 15C with less discriminatory, wiser methods.

Please vote down this proposal 155. As a wildlife enthusiast, biologist, and hunter, it ashames me to see our Alaska Department of Fish and Game being steered toward the wasteful, lazy management practices that are now being proposed by the BOG for unit 15C. Please consider that Alaskan wildife belongs to all of us citizens. Please consider that wolves, which have been here in North America for over two hundred thousand years longer than the first humans, have a right to hunt the same moose we hunt. Please consider that just as hunting is a part of Alaska's great heritage, so are wolves part of that great heritage, and without wolves, Alaska ceases to be great. Thank you for listening to my comment.