

Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 201

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area. Please select the proposals that you are in support of (select all that apply).

If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.

- # 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- #149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- # 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- #151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- #152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- #153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- # 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

Other areas setback proposals:

- #146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
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Comments:

As a professional photographer who travels to this beautiful state 4 to 5 times a year to photograph (and the Cooper Landing / Seward area consistently), I was appalled to find out just how dangerous it was for me to be wandering a little off the trails and paths to capture the beauty of undisturbed snow, stars at night, and the eagles in their natural state. The ideas presented here are not cumbersome to the trappers, it is an acknowledgement that tourism and visitors to the area should take equal precedent and provide equal safety for them and their pets. Without these updates I might be reluctant to return as I cannot safely predict these unnecessary dangers and shouldn't have to in reasonable areas of higher foot traffic. Please take these proposals seriously as I would hate to see people not enjoy the benefit of this picturesque area because trappers were unreasonable to consider the safety of others sharing the same space.
 (feel free to add extra pages of comments)

Printed Name (First and last)*: Kerry McAllister

Organization (if any) Professional Photographer

Signature*: *Kerry McAllister*

Email*: 

Street Address: 

City*: Beaverton State*: OR Zip code: 97006

*Indicates it must be filled in to be accepted.



Submitted by: Ken McCormick

Organization Name:

Community of Residence: Rainbow Valley Homeowner

Comment:

Please do not allow hunting in Rainbow Valley. We have a private community with children and elders. We live with bears and have few problems. It is absurd to think hunters would descend on our community and possibly wound brown bears. Who would communicate to the homeowners if this tragedy occurs. Residents are at risk much more by this hunt, than by our ability to live with and respect brown bears. Please!!! NO HUNT IN RAINBOW VALLEY

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 98: Oppose



Submitted by: Margaret McGinnis

Organization Name:

Community of Residence: Hull, MA

Comment:

I am writing to support Proposal 145 to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass.

This highway construction plans include multiple wildlife underpasses and Alaska's first wildlife overpass! Fencing will keep wildlife off the road and funnel them through these new crossings, but current regulations allow for hunting and trapping on these crossings.

This is beyond outrageous even by Alaska standards. These multi-million dollar crossings must be safe passages for wildlife.

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Proposal 145: Support Proposal 146: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support
Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 156: Support Proposal 157: Support
Proposal 158: Support Proposal 160: Support



Submitted by: Colin McGovern

Organization Name:

Community of Residence: Homer, AK

Comment:

Colin McGovern

39377 woodman lane north

Homer AK 99603

I am writing in support of the following setback proposals for trapping in unit 15C and others on the Kenai Peninsula:

Proposal 145

Proposal 146

Proposal 147

Proposal 148

Proposal 149

Proposal 150

Proposal 151

Proposal 152

Proposal 153

Proposal 154

My hope is that by implementing these 100 yard setbacks (which seems helpful in minimizing unintentional trapping of dogs) , trappers and non-trappers can find a happy medium to co-exist in these high public use areas.

Please consider the high volume of support for these setbacks by trappers and non-trappers alike.

Thank you,

Colin McGovern

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC205

Submitted by: Hope McGratty

Organization Name:

Community of Residence: Anchorage, AK

Comment:

I am writing to support Proposal #145 to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass. I recreate year around on the Kenai with my family, friends and our dogs. I respect trapping and believe appropriate set backs can keep us all safer while allowing us to enjoy our great state. Please ensure the safety of all by implementing trapping setbacks from the new wildlife crossings on the Sterling Highway Cooper Landing bypass.

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Proposal 146: Support Proposal 147: Support Proposal 148:
Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153:
Support Proposal 154: Support



PC206

Submitted by: Cody McLaughlin

Organization Name:

Community of Residence: Wasilla, Alaska

Comment:

As regards proposal 144 - 5 AAC 92.044

I am writing in support of this proposal. Words matter. And intentionally vague regulations that put the onus on the CITIZEN to read the mind of a future law enforcement official they've never met flies directly in the face of the original intent of the constitution where we are supposed to have a LIMITED GOVERNMENT.

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Proposal 144: Support

Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 207

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Comments:

As a born and raised Alaskan, whose father and husband trapped in past years, I understand the mindset of a trapper. I also support these proposals to help ensure safety for public trail users.

M.M.

(feel free to add extra pages of comments)

Printed Name (First and last)*: Maraley McMichael

Organization (if any) N/A

Signature*: Maraley McMichael

Email*: 

Street Address: 

City*: Palmer State*: AK Zip code: 99645

*Indicates it must be filled in to be accepted.



Dear Board of Game,

I am a Homer resident of 14 years having moved here to embrace the Alaskan lifestyle and to live in relationship to the natural world. I harvest and consume local natural resources and also value animals and ecosystems for their own rights to flourish. In my mind, these two are dependent on each other. The depletion and over-extraction of resources threatens our ability to utilize them in the future, as we have seen time and time again in our human history. The Kenai Peninsula is no longer a frontier of boundless wealth. The limits of what the landscape can provide to our increasing population is apparent and will require careful management if we wish for these animals to continue to provide to us.

I am writing to voice my opinions for the following proposals to change hunting and trapping regulations:

I support proposal 160 that would allow only one beaver per lodge to be taken in a single year and I support proposal 156 which would close beaver trapping on the Anchor and Deep Creek Rivers for 6 years.

I support these measures because I would like to see the beaver population on the lower Kenai re-establish itself to historic levels. Beavers are highly beneficial members of the ecosystems and their presence on the landscape improves habitat for birds and fish, reduces wildfire, retains cold water and stores carbon. Many degraded watersheds in the lower 48 are being restored by the reintroduction of beavers. The watersheds on the lower Kenai are clearly over-trapped and I believe that measures ought to have been taken to sustain the beaver population prior to its collapse. This oversight is regretful. I know of many abandoned dams in my area that no longer retain ponds because the beavers aren't here any more (Diamond Creek headwaters and atop the Homer Bench in the Fritz Creek Drainage). The dams are overgrown and broken, indicating that beavers used to be present but are no longer here. Thankfully, beavers can reestablish themselves, we just need to give them the chance to breed and proliferate (I also advocate for re-location of beaver to these areas to accelerate the repopulation process).

In recent years I have been involved in a community project called the Homer Drawdown: Peatland Project. A group of over 100 volunteers have collected data on peat depth in the muskegs around the Homer area. Our motivation to "put peat on the map" is a proactive response to our warming and drying climate. These community members are recognizing the incredible value of peatland habitats to our human and natural communities as well as the global carbon cycle. Peatland stores cold water that recharges the aquifer and allows for the conditions necessary for salmon fry to survive during their time in the freshwater. Peatlands provide a buffer to fire, refill our residential and municipal water supply, remove sediment and purify runoff. During our time in the field, it is strikingly apparent that these fens are drying out and the spruce is moving in, as evidenced by spreading saplings and no wood in the peat profile that would indicate a history of trees in these areas. Soon, many of these fens will no longer serve us as they have in the past. They will become fire bridges rather than fire breaks. I am advocating for the proposals that will give us our best chance at slowing this process - allow



beavers to recover so that they can do the essential work of retaining cold, fresh water in these peatlands.

I have attached a photo of myself holding a 15" rainbow trout that I caught right next to a beaver lodge on Swan Lake. You can see the excitement on my face at the thought of cooking my prize on a campfire and enjoying this meal under the stars. The ecosystem engineering that the beavers provide allow for trout to grow to full size.

I support activities that connect us to our natural world and uphold traditions of hunting and trapping. I sew my own beaver fur mittens and hats that I wear on my long-distance winter excursions and I can attest that nothing compares to the warmth that they provide. I might even consider becoming a trapper myself someday if I felt like the population was robust enough to support it, but there is no way that I would feel ethical as a trapper of beaver on the lower Kenai today because the population is so sparse.



*Kim McNett holds a prize rainbow trout that she caught near a beaver lodge on Swan Lake.
Photo by Bjorn Olson*

Additionally, I would like to voice support for proposals that safeguard sea duck populations in Kachemak Bay. My reasoning is similar to my above argument for beavers. If we over harvest a population we will not get to benefit from them in the future, whether for subsistence, hunting guide economy, eco-tourism, or the appreciation for biodiversity and intact coastal ecosystems. I



live right on the water and the sea ducks are a delight to observe during the winter as they utilize the sheltered waters of Kachemak Bay. I participate in the citizen science sea duck survey that has been going on in recent years. It seems very reasonable to me to have bag limits and accurate reporting of harvest so that we can use these resources responsibly and respond to any indications of population decline. An increase in human population will lead to increased use of resources and human impacts that put stresses on over-wintering birds, such as noise pollution and increased watercraft traffic. Baseline data and harvest reporting can help us keep a pulse on the population as it responds to environmental and climate related changes as well as our harvest impact.

I support proposals 164, 166 and 169 that would reduce the bag limit for goldeneye, bufflehead and harlequin ducks.

I support proposal 171 that would require accurate reporting of sea duck harvests.

I oppose proposals 162 and 163 and wish to maintain sea duck bag limits and the current shortened ptarmigan hunting season.

I also encourage proposals that would require trailside and roadside set-backs for hunting and trapping. This is both for the sake of the wildlife populations that will see an increase in pressure with increased human population and for safety reasons. During one of my winter camping trips (not on the Kenai) I was cutting some dead willow twigs on the side of the trail for a fire and I put my hand right on a trap. Thankfully the trap was tripped, but the experience really shook me up. I was 30 miles from the nearest village, traveling by human power, the sun was going down and I was preparing for a night of -35 F. A serious hand injury would have been life-threatening. It seems like common sense that hunters and trappers need to move away from human corridors in order to operate safely.

I support proposals 145, 146 and 147 for 100 yard set-backs from trails for traps and regulations that require hunters and trappers to go off of the road system ¼ mile.



Submitted by: Tom and Jane Meacham

Organization Name:

Community of Residence: Anchorage, Alaska

Comment:

My wife and I wholeheartedly support the comments on the various proposals affecting Anchorage and Chugach State Park that have been submitted by Rick Sinnott, retired Anchorage area biologist for ADF&G.

We also strongly support proposals 145-154 that would place setbacks and other requirements on recreational trapping on the Kenai Peninsula, in the paramount interest of public safety. We feel the Board of Game must recognize its responsibility to cooperate with other entities to promote public safety for all users of our public lands.

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Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Oppose Proposal 85: Oppose Proposal 86: Oppose Proposal 88: Oppose Proposal 89: Support Proposal 90: Oppose Proposal 92: Oppose Proposal 93: Support with Amendment Proposal 94: Oppose Proposal 95: Oppose Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Oppose Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 203: Oppose Proposal 208: Oppose



Submitted by: Carla Meitler

Organization Name:

Community of Residence: Homer AK

Comment:

I would like to see some limitations to the distance that trappers can set snares and traps from trails and roadways, so that people or domestic animals would be less likely to get caught or possibly killed in a trap. I support all of the proposed setbacks, and feel that trappers would still have ample space to conduct their trapping. I would honestly like to see a setback rule from any roadway also, but this would be a great start. Thank you.

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



Submitted by: Brad Melocik

Organization Name:

Community of Residence: Anchorage, AK

Comment:

While I support trapping, the conflicts between recreational users and trapping continues to increase. Traps found along trails and parking areas do nothing but create animosity toward trapping which is not fair to the trapping community or recreational users. Requiring a trapping license number or identifier on the trap to increase accountability for poor trapping practices is recommended. As a frequent user of the trails as well as a dog owner and bird hunter, reports of traps leads to anxiety. We have to find a way to keep both uses available.

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Proposal 55: Oppose Proposal 56: Support Proposal 57: Support Proposal 58: Oppose Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Support Proposal 63: Support Proposal 64: Oppose Proposal 65: Support Proposal 66: Oppose Proposal 67: Oppose Proposal 68: Support Proposal 69: Support Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Oppose Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Support Proposal 77: Oppose Proposal 78: Support Proposal 79: Support Proposal 80: Oppose Proposal 81: Support Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Support Proposal 85: Support Proposal 86: Support Proposal 87: Support Proposal 88: Oppose Proposal 89: Support Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Support Proposal 96: Support Proposal 97: Support Proposal 98: Support Proposal 99: Support Proposal 100: Support Proposal 101: Support Proposal 102: Support Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Support Proposal 106: Support Proposal 107: Support Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Support Proposal 113: Support Proposal 114: Oppose Proposal 115: Oppose Proposal 116: Support Proposal 117: Support Proposal 118: Oppose Proposal 119: Support Proposal 120: Oppose Proposal 121: Support Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Support Proposal 125: Support Proposal 126: Support Proposal 127: Oppose Proposal 128: Support Proposal 129: Support Proposal 130: Support Proposal 131: Support Proposal 132: Support Proposal 133: Support Proposal 134: Support Proposal 135: Support Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 140: Support Proposal 141: Support Proposal 142: Support Proposal 143: Oppose Proposal 144: Support Proposal 145: Oppose Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Support Proposal 159: Support Proposal 160: Support Proposal 161: Oppose Proposal 162: Support Proposal 163: Support Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Support Proposal 167: Oppose Proposal 168: Support Proposal 169: Oppose Proposal 170: Oppose Proposal 171: Support Proposal 172: Oppose Proposal 173: Support Proposal 174: Support Proposal 175: Support Proposal 176: Support Proposal 177: Support Proposal 178: Support Proposal 179: Support Proposal 180: Support Proposal 181: Support Proposal 182: Support Proposal 183: Support Proposal 184: Support Proposal 185: Support Proposal 186: Support Proposal 187: Support Proposal 188: Support



PC212

Submitted by: Elisabeth Mering

Organization Name:

Community of Residence: Homer, AK

Comment:

Good evening

I am writing in support of proposals 146 and 147 requiring trapping setbacks near popular trails in the Kachemak Bay Area. This area is used by lots of users and the risk of dogs being trapped directly off the trail is high. Simply having these set backs to allow both trappers to continue to operate and for hikers and snowshoers and skiers to also enjoy the trails with our dogs.

Thank you for your attention to this matter.

Liz.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support



PC213

Submitted by: Dan Mico

Organization Name:

Community of Residence: Moose Pass, AK

Comment:

I oppose proposals 148, 149, 150, 151, 152, 153, and 154.

I do not wholesale oppose the idea of setbacks, especially for residential areas and administrative sites such as campgrounds and trailheads, but I do not support these proposals as written.

They do not account for submerged water sets using larger conibear traps. These can be placed virtually anywhere without the chance of conflict with other users. Also, unit 7 is characterized by steep mountains with narrow valleys where the roads and waterways are located. Singly, these proposals would each remove some areas for water trapping, but collectively they remove large swaths of streams that could easily and are presently trapped without conflict.

Specific to proposals 148-153, I do not see how imposing setbacks outside of residential and administrative areas will make a difference. Will people leash their pets beyond 100 yards or take greater responsibility for them? I doubt it. The other side of this issue is that many people have no control of their dogs and prefer to let them run amok wherever they choose. Enforcing leash laws for dogs not engaged in organized hunting (ex., trained bird dogs) would reduce conflicts significantly.

Specific to proposal 154, I try to not call attention the beginning of my lines in an effort to reduce conflict. While they are a minority, there are those in unit 7 who actively seek out trap lines to tamper with traps and call attention to the line on social media. Requiring signs would only make this unlawful activity easier.

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Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose



PC214

Submitted by: Zane Mileur

Organization Name: Mileur's Guide Service

Community of Residence: Palmer, AK

Comment:

Opposition to Prop 78:

I believe that if the non resident guided permits that are reserved via giude/client contract are included in the draw results it will eliminate the confusion we have right now. Each reserved permit done by guides/clients should be reflected in the draw results. This way the draw results wont show unutilized permits and it will show resident hunters that indeed all permits are being utilized.

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Proposal 78: Oppose

Cooper Landing, AK Trap Setbacks



PC 215

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Comments:



PC 215

100 yards is not far away at all
from a trail. I don't find 100 yards
unreasonable or impracticable for a trapper
to harvest their catch. 100 yards will increase
safety for children and pets. As someone
who frequently uses multiple trails I
appreciate the signage to make me more
aware of possible hidden dangers

(feel free to add extra pages of comments)

Printed Name (First and last)*: Margaret Minkin

Organization (if any) _____

Signature*: Minkin

Email*: 

Street Address: 

City*: Seward State*: AK Zip code: 99662

*indicates it must be filled in to be accepted.



Submitted by: Jacob Mock

Organization Name:

Community of Residence: North Pole, Alaska

Comment:

Proposal 78 is beyond purview of the Board and should go before the legislature.

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Proposal 55: Oppose Proposal 56: Oppose Proposal 57: Support Proposal 58: Support Proposal 59: Support Proposal 60: Oppose Proposal 61: Support Proposal 62: Support Proposal 63: Oppose Proposal 64: Oppose Proposal 65: Support Proposal 66: Support Proposal 67: Support Proposal 68: Support Proposal 69: Support Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Support Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Support Proposal 77: Support Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Support Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Support Proposal 85: Support with Amendment Proposal 86: Support Proposal 87: Support Proposal 88: Support Proposal 89: Support Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Oppose Proposal 95: Oppose Proposal 96: Support Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Support Proposal 102: Support Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Support Proposal 109: Oppose Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal 114: Support Proposal 115: Oppose Proposal 116: Support Proposal 117: Support Proposal 118: Oppose Proposal 119: Support Proposal 120: Oppose Proposal 121: Support Proposal 122: Support Proposal 123: Support with Amendment Proposal 124: Support Proposal 125: Support Proposal 126: Support Proposal 127: Support Proposal 128: Support Proposal 129: Support Proposal 130: Support Proposal 131: Support Proposal 132: Support Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Support Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Support with Amendment Proposal 145: Support Proposal 160: Oppose Proposal 180: Support Proposal 181: Support Proposal 182: Support Proposal 183: Support Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose Proposal 200: Oppose Proposal 203: Support w/Am Proposal 204: Support Proposal 205: Oppose Proposal 207: Support Proposal 208: Oppose



Submitted by: Barrett Moe

Organization Name:

Community of Residence: Homer

Comment:

146 & 147

These proposals are for too large of an area. Trappers have the right to place a trap in the Anchor River, Deep creek drainage, wildlife refuge line. All areas that snomads trails go to. These are also hardly enforceable proposals. Just becomes another avenue for this group to hate another.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Oppose Proposal 147: Oppose



Submitted by: Bill Mohrwinkel

Organization Name:

Community of Residence: Palmer, AK

Comment:

I support Proposal 145. Having a ¼ hunting and trapping buffer from the entrances of the new wildlife crossing and culverts. This Proposal seems like a no-brainer. First it goes against fair chase is you are hunting/trapping in an artificially made funnel for wildlife. Also it would deter wildlife from using these crossing and culverts, defeating the whole reason for spending millions to save lives by preventing wildlife/human collisions.

I support Proposals 147, 149,150,151,152 and 153 These are all 100 yrd setbacks from high use trails, beaches, recreation areas, pull outs and campgrounds. I was a member of the working group to get set-backs on high use trails in the MatSu Valley and unfortunately the BOG voted against adopting this proposal. The main reason that was given was that this was a solution where there was no problem. A lack of data about trapping incidents on trails was brought up. There has historically been no clearinghouse to gather this data. ADF&G and the Troopers only keep track of these incidents if it was an illegally set trap. Most incidents with traps are with legal set traps set by an unethical, clueless or lazy trapper. Not only is this a problem, it's only getting worse. Do we really have to wait till there is a significant amount of dead or maimed dogs before you act? Or can we for once be preventative? The reality is that no one should be trapping anywhere near these area anyway, period.

I support Proposal 154. Requesting signage of active trapping in area. The opposition from the trapping community is that it will encourage people to steal or disturb traps. I feel quite the opposite would happen. If somebody knows there is trapping in an area, they will go somewhere else. I think traps are more apt to get stolen or disturbed because someone was unaware that there was trapping in an area and stumbled upon a trap and their dog got caught or almost caught. We make bear baiters sign their bait stations for safety, why not traps?

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support
Proposal 152: Support Proposal 153: Support Proposal 154: Support



I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.

Please select the proposals that you are in support of (select all that apply).

If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.

- # 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- #149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- # 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- #151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- #152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- #153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- # 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

Other areas setback proposals:

- #146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- #147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- # 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

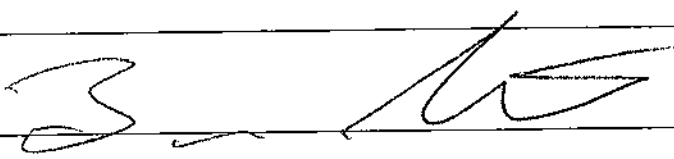


Comments:

(feel free to add extra pages of comments)

Printed Name (First and last)*: Brian Mandalbo

Organization (if any) _____

Signature*: 

Email*: 

Street Address: 

City*: Anchorage State*: AK Zip code: 99575

*Indicates it must be filled in to be accepted.



Submitted by: Caitlin Montalbo

Organization Name:

Community of Residence: Anchorage, AK

Comment:

I support proposed setbacks in Proposals #146 - 153 as they seem reasonable and are already informally honored by many local trappers. This additional measure ensures that our children and pets are safe and can freely run around protected areas without threat of injury/death. In addition, I support Proposal 145 which would provide necessary buffers around the new wildlife crossings and ensure they could cross safely without threat of injury; I also support Proposal 154 for signage in areas of active trapping in order to make it clear to those who are recreating in the area so they may be vigilant about keeping their pets/children in the protected areas.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.

Please select the proposals that you are in support of (select all that apply).

If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.

- # 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- #149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- # 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- #151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- #152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- #153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- # 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

Other areas setback proposals:

- #146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- #147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- # 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.



It is time for communities that
 overwhelmingly support an issue like
 trapping set backs on popular
 local trails be able to determine
 those regulations - not a small
 percentage of Alaskans that don't
 even live in the community.
 There is a lot of land in Alaska
 on which to trap. These few areas
 need the protection for winter
 recreational use.

(feel free to add extra pages of comments)

Printed Name (First and last)*: Sylvie Montalbo
 Organization (if any): property owner in Cooper Landing
 Signature*: Sylvie Montalbo
 Email*: [REDACTED]
 Street Address: [REDACTED]
 City*: Anchorage State*: AK Zip code: 99515

*indicates it must be filled in to be accepted.



Submitted by: Dan Montgomery

Organization Name:

Community of Residence: Wasilla, Alaska

Comment:

Hello Chairman Burnett and fellow board members.

My name is Dan Montgomery. I have lived in Alaska for 41 years. 3 years in Juneau, 8 years in Kotzebue and the last 30 years in the Mat-Su valley. I started big game guiding in 1985. I have been hunting and guiding every year in the Chugach Mts. since 1991. I have served on the Mat Valley A/C for close to 15 years now and I'm vice-chair of Game.

Proposal 208: Support

I wrote this ACR proposal because when the Dept. implemented my Statewide proposal 149, that this board passed to make a separate draw for non-resident 2nd degree of kindred hunters in March of 2022, they made some drastic mistakes in permit allocations. There were 62 any weapon permits issued in the draw in 2023. Under 5 AAC 92.057 the Dept shall issue a maximum of 13% of these permits to non-residents. That would be a total of 8.06 permits. There was only 7 issued this year. My proposal was to convert DS236 to a 2ndDK permit. This area known as 14C, Southwest in the draw permit handy dandy. It has the most permits issued in it. It has the best access and by far has the most resident and non-resident hunters applying for permits in it. There is currently 8 resident permits (DS136) and 1 non-resident permit (SD236) issued in this unit for the first hunting period, AUG. 10 to Aug. 22nd. The 10 year average is 1009 applications for SD136 and 210 applications for DS236. I chose DS236 to convert to a 2DK permit because it has the most resident interest, the permit holder has to hunt with a resident relative.

The Department instead converted DS224 into a 2DK permit and it was the only non-resident permit issued in that unit(14C,Northeast). They also eliminated DS233(14C, Upper Eagle River) for no reason and it needs to be issued again.

Unit14C went to separate sheep draws for non-residents in 2010. It was my proposal that the board passed in 2009 that limits non-residents to 13% of the permits. Guides were getting up to 100% of the permits in some areas back then and it was completely unfair for the resident hunters.

When the separate draws took place in 2010 there was to be at least 1 permit issued in each hunt area so non-residents would have access to every hunt area in 14C except for DS123 because there is only one permit issued for that hunt. That has been how the permits were issued for the last 14 years. The Dept. comments on this proposal states they will have to issue more than 13% of the permits to non-residents if permit numbers fall below 30. That simply isn't so and there has never been less than 53 any-weapon permits issued in any one year. If they ever do get that low they can just not issue a non-resident permit in some area, just like in DS123.

Please pass this proposal and instruct the Dept. to issue at least 1 non-resident guided only permit for each of the 4 hunt areas hunt areas in 14C and if you pass proposal 83 include that area(DS239) also.

Proposal 82 Support.

Prop. 83 Support. More opportunity.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 55: Oppose Proposal 56: Support Proposal 57: Oppose Proposal 58: Support Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Support Proposal 63: Support Proposal 65: Oppose Proposal 66: Oppose Proposal 67: Oppose

Proposal 68: Support Proposal 69: Oppose Proposal 70: Support with Amendment Proposal 71: Support Proposal 72:
Support Proposal 73: Support Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Support Proposal 77: Support
Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose Proposal 82: Support Proposal 83:
Support Proposal 84: Oppose Proposal 85: Support Proposal 86: Support Proposal 87: Oppose Proposal 88: Oppose
Proposal 89: Support Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94:
Support Proposal 95: Support Proposal 96: Support Proposal 97: Support Proposal 98: Support Proposal 99: Support
Proposal 100: Support Proposal 101: Oppose Proposal 102: Support Proposal 103: Oppose Proposal 104: Oppose
Proposal 105: Support Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose Proposal 109: Oppose Proposal
110: Oppose Proposal 111: Oppose Proposal 112: Oppose Proposal 113: Oppose Proposal 114: Oppose Proposal 115:
Support Proposal 116: Support Proposal 117: Support Proposal 118: Support Proposal 119: Oppose Proposal 120: Oppose
Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal
126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Support Proposal 131:
Support Proposal 132: Support Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Support
Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 140: Oppose Proposal 141: Support
Proposal 142: Support Proposal 143: Oppose Proposal 144: Support Proposal 145: Oppose Proposal 150: Oppose
Proposal 151: Support Proposal 152: Support Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose
Proposal 157: Support Proposal 158: Oppose Proposal 159: Support Proposal 160: Oppose Proposal 161: Oppose
Proposal 186: Support Proposal 187: Support Proposal 188: Support Proposal 200: Oppose Proposal 203: Support
Proposal 204: Support w/Am Proposal 205: Oppose Proposal 207: Oppose Proposal 208: Support



PC223

Submitted by: Josh Morales

Organization Name:

Community of Residence: Eagle River, AK

Comment:

Support setbacks for trapping in the Cooper Landing area.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC224

Submitted by: Virginia Morgan

Organization Name:

Community of Residence: Cooper Landing

Comment:

I am supportive of trapping, as long as it is not at the expense of safe recreational use in heavily used areas.

I support modest trapping setbacks and signage in high use areas.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



Submitted by: John Morton

Organization Name:

Community of Residence: Soldotna, AK

Comment:

Proposal 145:Support. Prohibiting hunting and trapping near wildlife overpasses and underpasses is a no-brainer to ensure our \$10.5 million public investment in helping wildlife move across the Sterling Highway is actualized. We don't want wildlife populations to become genetically segregated as moose have in Anchorage because of the Glenn Highway (Wilson et al. 2015).

Proposal 159:Oppose. ADFG expert [REDACTED] has written that Dall sheep in the Chugach-Kenai Mountains are declining because alpine tundra is being lost to rising tree- and shrub-line, and forage quality is reduced by hotter/drier conditions. Furthermore, Mycoplasma ovipneumoniae in sheep is clearly not well understood. What is certain is that wolverines rarely eat sheep. The wolverine population on the Kenai Peninsula is at a relatively low density (Golden et al. 2007) while harboring genetic haplotypes unique to populations elsewhere in northwestern North America (Tomasik and Cook 2005). In other words, we should be conserving wolverines on the Kenai Peninsula, not trying to liberalize their harvest.

Proposal 130:Oppose. GMU 15C has a low bull to cow ratio; consequently, 15C has had several years of antlerless hunts to reduce cows in the population. There's only one predator that disproportionately kills males over females, and that's humans (not bears or wolves). It's more likely a result of high unreported (illegal) take of bulls in Caribou Hills, an area with little law enforcement despite hundreds of cabins and enclaves like Nikolaevsk. Also, local ADFG biologists have expressed concern about snowmachines disturbing post-rut bulls at a time when they are already emaciated.

Proposals 146, 147, 148, 149, 150, 151, 152,153:Support. I want to see trapping continue as a recreational/subsistence pursuit, but it is irresponsible to not acknowledge that Alaska is urbanizing. Where public trails are maintained for other recreation, traps have no place. Kids and dogs should not be put at risk for a few trappers who are unwilling to walk 120 steps (100 yards) off trail.

Proposal 156:Support. Current management isn't working. ADF&G records indicate that historically the Anchor River drainage has supported a significant harvest of beavers. In 1976, almost half of 136 beavers taken in GMU15 came from the Anchor River. Except for 1 beaver in 2011, a beaver had not been harvested since 2006 despite active trappers in the area.

Proposal 160:Support. Trappers are still allowed the opportunity to harvest beaver, but this proposal ensures that beavers remain active on all drainages where they currently occur. Beaver dams are critical for recharging groundwater flow that maintains nonglacial salmon streams.

Proposal 109:Support. Dall sheep on the Kenai Peninsula have tanked. ADFG data shows the population declined 80% since 1968. Current management using full curl regs has not worked so why continue it? Our goal is SUSTAINABLE populations, not declining ones.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 104: Support Proposal 109: Support Proposal 130: Oppose Proposal 145: Support Proposal 146: Support
Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support
Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 156: Support Proposal 159: Oppose
Proposal 160: Support



PC226

Submitted by: Katrina Moss

Organization Name:

Community of Residence: Anchorage, AK

Comment:

Please reduce conflicts between recreational users and trappers by establishing setbacks of 400 yards along both sides of trails and all sides of trailheads on the Kenai Peninsula and Chugach State Park.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC227

Submitted by: Nicholas Mumma

Organization Name:

Community of Residence: Homer, Ak

Comment:

I support proposals 146 and 147 regarding 100 yard setbacks for trapping from high use recreational trails in the Homer area.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Support Proposal 147: Support



Submitted by: Jon Nichols

Organization Name:

Community of Residence: Cordova, AK

Comment:

As a lifelong Cordovan, the proposals for Unit 6 directly affect my way of life. Proposal 59 could only have been written by someone who lacks knowledge of our area and simply picked that spot because it “looked good” on a map... the proposal seeks to limit access to one of our goat hunting units by limiting who gets to hunt it even though only one of the seven goats have been harvested so far this season. Ironically I hunted there today in search of goats... and after finding one I realized that this was the easiest goat hunt I’ve ever been on and that it would be a perfect place to take my young daughter to kill her first goat just like sheridan unit rg231 was where I killed my first goat. There is so much opportunity to hunt goats in Unit 6, there is no reason to limit any users access, especially when our road access goat units still have 17 out of 26 available and the season is almost over.

Proposal 60-

seeks to limit access to users when there is no need. PWS is a huge place with so much hunting area that you might be the only human for miles. Why would we need to give exclusive access to archery hunters when 99% of the time anyone in the woods any given day already have exclusiveness.

Proposal 61-

makes claims that no one needs more than 3 deer per year. What right do they have to dictate how much meat I need to feed my family... the deer population is controlled almost entirely by our winters severity. They could close deer hunting entirely and it’s population growth could still be stifled by a bad winter.

Proposal 63-

Should be approved so people can shoot brown bears they encounter while deer hunting. Most people start deer hunting once any-deer opens October 1. More people in woods means more chance of encountering bears. The bears in October are more aggressive since salmon are tapering out and chance of conflict is higher. Being able to shoot the bears legally/ in season and not claim DLP and forfeit the hide is a step in the right direction.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Oppose Proposal 63: Support Proposal 64: Support



Submitted by: Nat Nichols

Organization Name:

Community of Residence: Kodiak, Alaska

Comment:

I'm a Kodiak resident and my position on select Unit 8 proposals are as follows:

Proposals 66 and 67 - I oppose these proposals. Ample archery goat hunting opportunity already exists. These proposals are counter to ADF&Gs objective of reducing or stabilizing the Kodiak goat population.

Proposal 68 - I support this proposal. If ADF&G needs better tools to conservatively manage the Kodiak caribou/reindeer herd, then I support giving them that authority.

Proposal 70 - I support this proposal. Very few cows are being harvested under the current draw hunt. Making this a registration hunt makes sense.

Proposal 73 – I support this proposal as amended by the Kodiak AC (reduce deer bag limit for nonresidents from 3 to 1).

Proposal 74 – I support this proposal as amended by the Kodiak AC (deer must remain bone-in, the AC amended it to make the language clearer based on input from AWT).

Proposal 81 – I support this proposal. There's no reason for bears, deer, and dogs to continue being injured or killed by snares when a simple solution exists.

Thank you for your public service and for your considerations of these important matters regarding the responsible management of our game resources.

Nat Nichols

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 66: Oppose Proposal 67: Oppose Proposal 68: Support Proposal 70: Support Proposal 71: Proposal 73: Support with Amendment Proposal 74: Support with Amendment Proposal 81: Support



Submitted by: Natalya Nichols

Organization Name:

Community of Residence: Cooper landing

Comment:

As a resident of the area with multiple dogs that are well trained, I would appreciate signs. Signs would be an easy way of letting people know to bring your pets in closer or avoid the area

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



Submitted by: Clifford Norwood

Organization Name:

Community of Residence: homer and nikiski

Comment:

I support Proposal 146 and 147 homer area trapper setbacks in Homer area. I have lived in and have owned property in the Ohlson mountain area since 1982. At one time it was considered a remote area and it was not an issue where trappers set up trap lines. Well, it is not that way anymore and everyone needs to be respectful of the other users in the area. It doesn't seem to me that a 100 yard buffer is that big of a deal for trappers who more often then not are out to have an good experience. I am pretty sure the trappers are not trying to trap local dogs.

As authorized by Alaska Statute 16.05.260, which originally passed in 1959, the Joint Board of Fisheries and Game has established 84 advisory committees for the purpose of providing a local forum for the collection and expression of opinions and recommendations on matters related to the management of fish and wildlife resources. The regulations governing the advisory committee are 5 AAC Chapters 96 and 97.

The AC is to represent ALL users of Alaska fish and wdlife resources. Everyone out on those trails are users of fish and wildlife resources....it is not the sole domain of the trappers.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Support Proposal 147: Support Proposal 162: Support



Submitted by: Holly Norwood

Organization Name:

Community of Residence: Nikiski and Homer, Alaska

Comment:

RE: Homer Area Proposals #146 and #147 regarding 100 yard trapping setback from trails.

The 100 yard setback for these public use trails is warranted to mitigate the ongoing trapping of unintended species, for example dogs. These crucial proposals are a valid compromise that optimize community safety and are supported by several member of the trapping community. All the trails in the Homer are permanent GPS located trails and DO NOT MOVE as some AC members have implied.

I would appreciate the Board of Game implementing the 100 yard trapping setback in these proposals.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Support Proposal 147: Support Proposal 162: Support



Submitted by: Philip Nuechterlein

Organization Name:

Community of Residence: Eagle River, AK

Comment:

I support proposal 78. Non-resident hunter opportunity is given priority over resident hunter opportunity under the current regulations.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:



United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

In Reply Refer To:
OSM.23025.LG

FEB 22 2023

Mr. Jerry Burnett, Chairman
Attention: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Burnett:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Game proposals during the March 17-22, 2023 Southcentral Region Meeting.

The Office of Subsistence Management, working with other Federal agencies, reviewed each of these proposals. The attached document includes comments from OSM regarding proposals that have the potential to impact federally qualified subsistence users or associated wildlife resources on or adjacent to Federal public lands in Alaska. During the meeting, we may wish to comment on other agenda items that might impact federally qualified subsistence users or wildlife resources.

Again, we appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822 or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Scott Ayers
Acting Assistant Regional Director
Office of Subsistence Management

Enclosure

cc: Federal Subsistence Board
Office of Subsistence Management

Interagency Staff Committee
Southcentral Alaska Regional Advisory Council
Kodiak/Aleutians Regional Advisory Council
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record





RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Southcentral Region Meeting

March 17-22, 2023

Soldotna, Alaska

Office of Subsistence Management (OSM)

**PROPOSAL 56 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.**

Prohibit taking of big game from boats in Units 6, 7, and 15.

Current Federal Regulations:**§ 100.26 Subsistence taking of wildlife.**

(b) Prohibited methods and means. Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:

(4) Taking wildlife from a motorized land or air vehicle when that vehicle is in motion, or from a motor-driven boat when the boat's progress from the motor's power has not ceased.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: There would be no expected impact on wildlife from adoption of this proposal. This proposal would not affect Federally qualified subsistence users harvesting under Federal regulations on Federal public lands as taking wildlife from a boat is currently allowed as long as the boat is not under propulsion from the engine. However, this may affect Federally qualified subsistence users' overall ability to harvest wildlife by methods they are historically accustomed to and would decrease their opportunity under State regulations. Federally qualified subsistence users routinely harvest in this manner, interchangeably where seasons overlap, under both Federal and State regulations as the season dictates (Meixell 2023, pers. comm.). Adopting this proposal would restrict that ability.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing enforcement and regulatory complexity and potentially contributing to user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 56.

Rationale: This proposal would affect Federally qualified subsistence users' ability to harvest wildlife resources, decreasing opportunity and potentially reducing their ability to meet their needs. It may also lead to enforcement confusion as to who is allowed to harvest game from a boat and where that may occur.

Literature Cited

Meixell, B.W. 2023. Wildlife Biologist. Personal communication: e-mail. US Forest Service. Cordova, AK.

**PROPOSAL 60 – 5 AAC 85.030. Hunting seasons and bag limits for deer.**

Create an archery only deer hunt in Unit 6 for resident and nonresident certified bowhunters only.

Current Federal Regulations:**Unit 6 - Deer**

Unit 6 – 5 deer; however, antlerless deer may be taken only from Oct. 1 – Dec. 31. Aug. 1 – Jan. 31

Only 1 of the 5 deer harvest limit may be taken between Jan. 1-31

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: This proposal would decrease opportunity for Federally qualified subsistence users to harvest deer under State regulations by replacing firearm seasons with archery-only seasons and requiring a less efficient means of harvest. However, Federally qualified subsistence users could still hunt deer using rifles on Federal public lands in Unit 6 under Federal regulations, which increases the Federal priority. Misalignment of hunting methods between State and Federal regulations also increases regulatory complexity and law enforcement concerns.

Conservation concerns for Unit 6 deer are minimal. Harvest limits are high, and pellet group surveys conducted by ADF&G in Unit 6, between RY16-RY20 indicate that the Unit 6 deer population was high four of the last five years (Westing 2022). Between RY10 and RY19, the average harvest for deer hunters in Unit 6 was 1.6 deer per year, indicating high success rates (OSM 2022). Therefore, little impact to the deer population is expected from this proposal.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 60.

Rationale: This proposal would decrease opportunity for Federally qualified subsistence users to harvest deer under State regulations. Little impact to the deer population is expected.

Literature Cited

OSM. 2022. Staff analysis WP22-24. Pages 941-952 *in* Federal Subsistence Board Meeting Materials. April 12-15, 2022. Office of Subsistence Management, USFWS. Anchorage, AK. 1267pp.

Westing, C.L. 2022. Deer Management Report and Plan, Game Management Unit 6: Report Period 1 July 2016-30 June 2021, and Plan Period 1 July 2021-30 June 2026. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2022-21. Juneau, AK. 3pp.



PROPOSAL 61 – 5 AAC 85.030. Hunting seasons and bag limit for deer.

Lower the resident and nonresident general season bag limit for deer in Unit 6.

Current Federal Regulations:

Unit 6 - Deer

Unit 6 – 5 deer; however, antlerless deer may be taken only from Oct. 1 – Dec. 31. Aug. 1 – Jan. 31

Only 1 of the 5 deer harvest limit may be taken between Jan. 1-31

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunities for federally qualified subsistence users hunting deer under State regulations. However, this proposal would provide a greater Federal subsistence priority on Federal public lands as federally qualified subsistence users could still harvest 5 deer under Federal regulations. It may also slightly reduce competition with non-Federally qualified users on Federal public lands as anyone hunting under State regulations would be limited to 3 deer, meeting their limit sooner, which could result in their spending less time hunting.

Little impact to the deer population is expected. Pellet group surveys conducted by ADF&G in Unit 6, between RY16-RY20 indicate that the deer population in Unit 6 was high four of the last five years (Westing 2022). Between RY10 and RY19, the average harvest for deer hunters in Unit 6 was 1.6 deer per year (OSM 2022), suggesting reducing the State harvest limits would not substantially affect the deer population.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 61.

Rationale: This proposal would decrease opportunity for Federally qualified subsistence users hunting on State-managed lands but would increase the Federal subsistence priority for deer on Federal public lands. No impact to the deer population is expected.

Literature Cited

OSM. 2022. Staff analysis WP22-24. Pages 941-952 in Federal Subsistence Board Meeting Materials. April 12-15, 2022. Office of Subsistence Management, USFWS. Anchorage, AK. 1267pp.

Westing, C.L. 2022. Deer Management Report and Plan, Game Management Unit 6: Report Period 1 July 2016-30 June 2021, and Plan Period 1 July 2021-30 June 2026. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2022-21. Juneau, AK. 3pp.



PROPOSAL 62 – 5 AAC 85.045(4). Hunting seasons and bag limits for moose.

Re-establish an antlerless moose season in Unit 6C.

Current Federal Regulations:

Unit 6C - Moose

*Unit 6C – 1 antlerless moose by Federal drawing permit (FM0603) only. Sept. 1 – Oct. 31
Permits for the portion of the antlerless moose quota not harvested in Sept.
1 – Oct. 31 hunt may be available for redistribution for a Nov. 1 – Dec. 31
hunt.*

Unit 6C – 1 bull by Federal drawing permit (FM0601) only. Sept. 1 – Dec. 31

In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits.

Federal public lands are closed to the harvest of moose except by Federally qualified users with a Federal permit for Unit 6C moose, Nov. 1 – Dec. 31.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

However, in April 2024 the Board will consider Wildlife Closure Review WCR24-41, which reviews the closure to moose hunting in Unit 6C on Federal public lands by non-Federally qualified users from Nov. 1 – Dec. 31.

Impact to Federal subsistence users/wildlife: The current management strategies in Unit 6C are a direct result of the cooperative moose management plan developed by the Prince William Sound/Copper River Delta Advisory Committee, ADF&G, and local residents. Part of the management system is allocating 75% of the bull harvest permits to Federally qualified subsistence users and the remaining 25% for people hunting under State regulations, while 100% of the antlerless moose permits are allocated to Federally qualified subsistence users (Westing 2018). The moose harvest allotment currently provides for a Federal subsistence priority.

Therefore, this proposal would have a minimal effect on Federally qualified subsistence users as they are allocated 100% of the antlerless moose permits. In its proposal, ADF&G notes that while antlerless moose hunts had been in State regulations prior to 2021, none had been held since 1999 due to the Federal allocation. However, OSM has concerns over the proposed registration hunt in November and December as Federal regulations currently state that, “Permits for the portion of the antlerless moose quota not harvested in Sept. 1 – Oct. 31 hunt may be available for redistribution for a Nov. 1 – Dec. 31 hunt.” Given



this, close coordination between the Federal in-season manager and ADF&G is imperative if this proposal passes.

No impact to the Unit 6C moose population is expected if this proposal is adopted due to the close management of harvest quotas and permits.

Federal Position/Recommended Action: The OSM recommendation is **support** Proposal 62 **with modification** to change the registration permit hunt to “may-be-announced”.

Rationale: Re-establishing State antlerless moose seasons in Unit 6C provides management flexibility, although they are unlikely to be held due to current management strategies and harvest allocations. As 100% of the antlerless moose quota is allocated to Federally qualified subsistence users and permits for the unmet quota may be redistributed in November and December under Federal regulations, a “may-be-announced” season is more appropriate for the proposed State registration permit hunt, Nov. 1-Dec. 31.

Literature Cited

Westing, C. 2018. Moose management report and plan, Game Management Unit 6: Report period 1 July 2010-30 June 2015, and plan period 1 July 2015-30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&RP-2018-15, Juneau, AK. 70 pp.

PROPOSAL 64 – 5 AAC 92.095(4). Unlawful methods of taking furbearers; exceptions.

Reduce the minimum jaw spread for trapping land otter in Unit 6 from 5 7/8 to 5 1/8.

Current Federal Regulations:

§ 100.26(d) *Trapping furbearing animals. The following methods and means of trapping furbearers for subsistence uses pursuant to the requirements of a trapping license are prohibited, in addition to the prohibitions listed at paragraph (b) of this section:*

(4) *Taking otter with a steel trap having a jaw spread of less than 5 7/8 inches during any closed mink and marten season in the same Unit.*

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adopting this proposal would reduce the minimum jaw spread requirement for otters under State regulations in Unit 6, creating a misalignment of State and Federal regulations, increasing regulatory complexity, and potentially causing user confusion and law enforcement concerns.

The use of traps with smaller jaw spreads would increase the likelihood of unintended harvest of mink or martens out of season. Otters in Unit 6 are considered scarce and no otter harvest in Unit 6 was reported in 2021 (Bogle 2022). Adoption of this proposal would likely have little impact on the otter population but may increase incidental harvest of mink and marten.



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

Rationale: The minimum jaw spread of 5 7/8 is required for taking otter during any closed mink and marten season in the same unit to minimize out of season harvest of these species. Adopting this proposal increases the likelihood of accidental, illegal harvest and law enforcement concerns.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

PROPOSAL 73 – 5 AAC 85.030. Hunting season and bag limits for deer.

Reduce the bag limit for deer in Unit 8, remainder.

Current Federal Regulations:

Unit 8, remainder - Deer

All lands within the Kodiak Archipelago within the Kodiak National Wildlife Refuge, including lands on Kodiak, Ban, Uganik, and Afognak Islands – 3 deer; however, antlerless deer may be taken only from Oct. 1 – Jan. 31. Aug. 1 – Jan. 31

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunity for Federally qualified subsistence users hunting deer under State regulations, and would misalign State and Federal harvest limits, increasing regulatory complexity. While much of the land in Unit 8, remainder is Federal public lands, lands around communities are State-managed. Therefore, this proposal might burden local residents who would have to travel further to harvest a third deer.

However, this proposal would provide a Federal subsistence priority on Federal public lands as federally qualified subsistence users could still harvest 3 deer under Federal regulations. It may also slightly reduce competition with non-Federally qualified users on Federal public lands as anyone hunting under State regulations would be limited to 1-2 deer, meeting their limit sooner, which could result in their spending less time hunting.

Given the size and difficulty in accessing this hunt area, deer populations are primarily regulated by winter severity and are not influenced by hunter harvest (Pyle 2023, pers. comm.), suggesting minimal impacts to the deer population if this proposal is adopted. However, no deer population surveys occur in Unit 8 and harvest ticket reports provide limited information on harvest location. Information from harvest reports, hunters, guides, and transporters are the primary source for deer population information (Svoboda and Crye 2015). Deer harvest for all of Unit 8 over the last 10 years has ranged from 2,794 in



RY2012 to 8,137 in RY2016. More recently, Unit 8 deer harvest was 3,484 in RY2020 followed by 4,797 deer in RY2021 (ADF&G 2022). Using harvest as a rough index for population trend, the Unit 8 deer population does not appear to be declining. Additionally, Kodiak NWR surveys indicate that intensive use of key winter browse such as red elderberry has been sustained from 2017-2022, further suggesting that the deer population has not declined (Pyle 2023, pers. comm.).

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 73.

Rationale: The status of the Unit 8, remainder deer population is uncertain, but does not appear to be declining. This proposal would decrease opportunity for Federally qualified subsistence users hunting on State-managed lands but would provide a Federal subsistence priority for deer on Federal public lands.

Literature Cited

ADF&G. 2022. Sitka Black-tailed Deer Hunting in Alaska.

<http://www.adfg.alaska.gov/index.cfm?adfg=deerhunting.deerharvest> Retrieved: January 24, 2023.

Pyle, B. 2023. Supervisory Wildlife Biologist. Kodiak National Wildlife Refuge. Personal communication: e-mail. U.S. Fish and Wildlife Service. Kodiak, AK.

Svoboda, N. J., and J. R. Crye. 2015. Unit 8 deer management report. Pages 9-1 through 9-16 *in* P. Harper and L. A. McCarthy, editors. Deer management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-3, Juneau, AK.

PROPOSAL 74 – 5 AAC 92.220. Salvage of game meat, furs, and hides.

Require that meat must be left on the bone when hunting deer in Unit 8.

Current Federal Regulations: None

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adopting this proposal would burden Federally qualified subsistence users hunting under State regulations by requiring them to pack out heavier loads from the field or make additional trips, and by reducing their options in how to process their harvests. This could also increase incidences of hunter-bear conflicts as bears might claim carcasses while hunters are packing out multiple loads. It would also increase regulatory complexity and law enforcement concerns as officers would need to know whether or not deer were harvested under State or Federal regulations. There would be no impact on the deer population in Unit 8.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** proposal 74.

Rationale: This proposal would require that edible meat remain naturally attached to the bone until the meat has been transported from the field or is processed for human consumption. This would be more



weight for users to carry out and potentially take longer by requiring multiple trips, burdening Federally qualified subsistence users.

PROPOSAL 86 – 5 AAC 85.045(5). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

Current Federal Regulations:

Unit 7—Moose

Unit 7, that portion draining into Kings Bay - Federal public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek *No open season*

Unit 7, remainder—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only *Aug. 20 - Sep. 25*

Unit 14—Moose

No Federal open season

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: These comments apply only to Unit 7. Adopting this proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose under State regulations. It is not expected to have a detrimental effect on the Twentymile/Portage/Placer moose population. The moose population in the Twentymile/Portage/Placer drainages is characterized by large population fluctuations associated with winter severity. As a result, the option to administer antlerless hunts is an important tool for managing population size within the appropriate range. Because the number of antlerless permits issued for the Twentymile/Portage/Placer hunt is adjusted annually, accounting for current population metrics, there are no conservation concerns.

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

Rationale: Reauthorizing the antlerless season provides additional harvest opportunities to Federally qualified subsistence users and management flexibility to sustainably manage this moose population.



PROPOSAL 105 – 5 AAC 92.052. Discretionary permit hunt conditions and procedures.

Limit hunters to one big game registration permit at a time in Units 7 and 15.

Current Federal Regulations: None

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: This proposal will greatly reduce Federally qualified subsistence users’ hunting opportunities in Units 7 and 15 under State regulations. There are multiple State and Federal big game registration permits between the two units. If adopted, this proposal would eliminate the ability for subsistence hunters to utilize registration hunts with overlapping or adjacent hunt areas and/or seasons (e.g., brown bear and goat), which can reduce costs and improve hunting success by taking advantage of optimal weather windows. As Units 7 and 15 consist of a checkerboard of State and Federal managed lands, adopting this proposal may inhibit the ability of Federally qualified subsistence users to meet their needs. This proposal is not expected to have any substantial impacts on big game populations.

A possible modification of this proposal is to limit hunters to only one goat registration permit at a time in Units 7 and 15. If the number of goat registration permits in these units are limited, then limiting hunters to one permit at a time would result in more equitable permit distribution as well as permits being available to more people, including Federally qualified subsistence users.

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

Rationale: Limiting hunters to one big game registration permit at a time in both units would greatly reduce opportunity for Federally qualified subsistence users who hunt multiple species with registration permits in these units.

PROPOSAL 108 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Make all sheep hunts in Units 7 and 15 registration hunts.

Current Federal Regulations:

Unit 7 – Sheep

Sheep: 1 ram with full curl horn or larger by Federal drawing permit Aug. 10–Sep. 20.

Unit 15 – Sheep

Sheep: 1 ram with 3/4 curl horn or larger by Federal drawing permit Aug. 10–Sep. 20.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.



Impact to Federal subsistence users/wildlife: Federally qualified subsistence users currently have the opportunity to harvest a full curl ram in Unit 7 or a ¾ curl ram in Unit 15 via Federal drawing permit on Federal public lands. Adopting this proposal would not affect that opportunity. However, Federally qualified subsistence users hunting under State regulations would need to obtain a State registration permit instead of a State drawing permit or harvest ticket.

Kenai sheep abundance and harvest has been declining since 2011 (Herreman 2021, pers. comm.). By converting the DS150 and DS156 drawing permits to registration permits, ADF&G's ability to manage sheep harvest in the affected units would be reduced, which may negatively impact these declining sheep populations. Modifying this proposal to only change the harvest ticket hunts to registration permits would provide ADF&G with better harvest report data and more management flexibility, which could help conserve these sheep populations and enhance long-term hunting opportunity.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 108 **with modification** to change only harvest ticket hunts in Units 7 and 15 to registration permit hunts.

Rationale: Improved harvest reporting data would provide a better understanding of harvest mortality, enhancing sheep management, while the increased management options provided by registration permit hunts (i.e., closing seasons early and limiting the number of permits issued) could help conserve sheep, ensuring long-term hunting opportunity on the Kenai Peninsula.

Literature Cited

Herreman, J.H. 2021. Wildlife Biologist. Personal communication: e-mail. Alaska Department of Fish and Game, Homer, AK.

PROPOSAL 109 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Close sheep hunting on the Kenai Peninsula, Unit 15.

Current Federal Regulations:

Unit 15 – Sheep

Sheep: 1 ram with 3/4 curl horn or larger by Federal drawing permit Aug. 10–Sep. 20.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: This proposal would also eliminate all opportunity for Federally qualified subsistence users hunting sheep under State regulations in Unit 15. Federally qualified subsistence users would still have the opportunity to harvest a ¾ curl ram in Unit 15 via Federal drawing permit on Federal public lands. However, only one Federal permit has been issued each year since the hunt's inception in 2020, and the Federal in-season manager may close the season and set harvest quotas based on the status of the sheep population and in consultation with ADF&G and others.



Closing Unit 15 to the harvest of sheep under State regulations may allow for recovery of the sheep population in the unit, which has been declining since 2011 (Herreman 2021, pers. comm.). Based on long-term ADF&G minimum count data, the Kenai Peninsula sheep population trend has been declining since 1968. This population has declined by about 67% since the latest peak estimate of about 1500 individuals in 1996 to about 500 in 2016 (ADF&G 2019). If sheep hunting closed under State regulations in Unit 15 and the population were to increase, more opportunity for harvest could be provided to Federally qualified subsistence users in the future.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 109.

Rationale: Conservation concerns exist for the Unit 15 sheep population. While opportunity for Federally qualified subsistence users hunting sheep under State regulations in Unit 15 would be eliminated, potential increases in sheep abundance could provide more hunting opportunity in the future.

Literature Cited

Alaska Department of Fish and Game (ADF&G) 2019.Tab 5.1. Kenai Peninsula Overview. Presentation at the Alaska Board of Game, Southcentral Region: March 14-19, 2019.

Herreman, J.H. 2021. Wildlife Biologist. Personal communication: e-mail. Alaska Department of Fish and Game, Homer, AK.

PROPOSAL 110 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Create an archery only registration hunt and youth hunt for sheep in Unit 7 Remainder.

NOTE: These comments only apply to the registration hunt portion of this proposal and do not apply to the youth hunt portion of this proposal.

Current Federal Regulations:

Unit 7 – Dall Sheep

Unit 7 – 1 ram with full curl horn or larger by Federal drawing permit Aug. 10 – Sept. 20

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: This proposal would decrease opportunity for Federally qualified subsistence users to harvest Dall sheep (sheep) under State regulations by requiring a less efficient means of harvest. Federally qualified subsistence users with Federal drawing permits could still hunt sheep using rifles on Federal public lands in Unit 7, which may negate the safer, quieter hunting



experience the proponent is seeking. This misalignment of hunting methods between State and Federal regulations increases regulatory complexity and law enforcement concerns.

Conservation concerns exist for Kenai Peninsula sheep as their population as well as harvest have been declining over the long-term. Between Regulatory Year (RY) 2011 – 2016, in Units 7 and 15, the sheep population decreased from 644 in 2011 to 104 in 2020 (Herreman 2021, OSM 2022). Unit 7 sheep harvest averaged 6.9 sheep per year between RY00-RY09, but then dropped to 3.9 sheep per year between RY2010-2019 (OSM2022). A less efficient hunting method may decrease hunting pressure on and harvest of the Unit 7 sheep population, addressing some conservation concerns.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 110.

Rationale: While this proposal decreases opportunity for Federally qualified subsistence users hunting under State regulations, OSM supports regulatory measures to help conserve the declining Unit 7 sheep population. A less efficient hunting method may address some conservation concerns, although other regulatory changes (i.e., limited registration or draw permit hunts, may-be-announced seasons, or harvest quotas) could also address conservation concerns.

Literature Cited

Herreman, J. 2021. Dall Sheep Management Report and Plan, Game Management Units 7 and 15: Report Period 1 July 2011 – 30 June 2016, and Plan Period 1 July 2016 – 20 June 2021. Alaska Departments of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2018-34. Juneau, AK.

OSM. 2022. Staff analysis WP22-25b/26b. Pages 958-973 *in* Federal Subsistence Board Meeting Materials. April 12-15, 2022. Office of Subsistence Management, USFWS. Anchorage, AK. 1267pp.

PROPOSAL 114 – 5 AAC 85.040. Hunting seasons and bag limits for goats.

Change the RG331 goat hunt in Unit 7 to archery only hunt.

Current Federal Regulations:

Unit 7 – Goat

*Goat: 1 goat by Federal Drawing permit. Nannies accompanied by kids Aug. 10-Nov 14.
may not be taken*

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users currently may harvest a goat in Unit 7 via Federal drawing permit on Federal public lands. Adopting this proposal and changing the RG331 permit to archery only would not affect that opportunity. However, Federally qualified subsistence users hunting under a State RG331 permit would experience a reduction of harvest



opportunity as harvesting any animal, especially a mountain goat, with archery equipment is more difficult and less efficient than with a modern firearm.

As the RG331 hunt has a may-be-announced season, changing this hunt to archery only could affect whether or not a season is opened. It would also increase regulatory complexity as firearms would remain a legal means for the other Unit 7 goat hunts. Federally qualified subsistence users with a Federal drawing permit would also still be able to use firearms within the RG331 permit hunt area under Federal regulations. As harvest opportunity in this permit area is limited and closely managed (e.g., only one DG331 permit available in 2022), no substantial impacts on the goat population are expected from this proposal.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 114.

Rationale: Adoption of this proposal would decrease opportunity for Federally qualified subsistence users hunting under a State registration permit.

PROPOSAL 118 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

Change the general season, resident bag limit for moose in Unit 15 to include bulls with fork antlers.

Current Federal Regulations:

Unit 15 – Moose

<i>Unit 15A - Skilak Loop Wildlife Management Area</i>	<i>No open season.</i>
<i>Units 15A remainder, 15B, and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only</i>	<i>Aug. 20-Sep. 25.</i>
<i>Units 15B and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai NWR Refuge Manager is authorized to close the October-November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council</i>	<i>Oct. 20-Nov. 10.</i>
<i>Unit 15C - 1 cow by Federal registration permit only</i>	<i>Aug. 20-Sep. 25.</i>

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: According to the latest survey results published by ADF&G, the Unit 15A moose population is below management objectives, the Unit 15B population



estimates suggest a continued decline from peak numbers in the 1960s, while the Unit 15C moose population is currently within management objectives (Herreman 2022). Comparisons of harvest trends from the period of spike-fork harvest (prior to 2010) with the current restriction of spike only (2013–2019), shows higher rates of harvest during the spike-fork harvest limit than the spike only period (ADF&G 2019). With moose populations decreasing and/or below management objectives in two of three subunits in Unit 15, liberalizing the harvest limit would likely increase harvest and may cause conservation concerns for moose in Unit 15.

Federally qualified subsistence users can already harvest bulls with spike-fork antlers in Unit 15. While adoption of this proposal would provide more opportunity for users hunting under State regulations and would align Federal and State harvest limits, it would also decrease the Federal subsistence priority, potentially increasing competition between user groups.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 118.

Rationale: This proposal may negatively impact the Unit 15 moose population. More recent population metrics should be analyzed prior to liberalizing harvest limits.

Literature Cited

Alaska Department of Fish and Game (ADF&G) 2019.Tab 5.1. Kenai Peninsula Overview. Presentation at the Alaska Board of Game, Southcentral Region: March 14-19, 2019.

Herreman, J. 2022. Moose management report and plan, Game Management Unit 15: Report period 1 July 2015-30 June 2020, and plan period 1 July 2020-30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-24, Juneau, AK.

PROPOSAL 128 – 5 AAC 85.045(13). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 15C.

Current Federal Regulations:

Unit 15 – Moose

Units 15A remainder, 15B, and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only Aug. 20-Sep. 25.

Units 15B and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai NWR Refuge Manager is authorized to close the October-November season based on conservation concerns, in Oct. 20-Nov. 10.



*consultation with ADF&G and the Chair of the Southcentral Alaska
Subsistence Regional Advisory Council*

Unit 15C - 1 cow by Federal registration permit only

Aug. 20-Sep. 25.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users can already harvest antlerless moose with a Federal subsistence drawing permit on Federal public lands during the fall in Unit 15C, although Federal public lands only comprise 28% of Unit 15C and habitat can be a limiting factor during winters with deep snow accumulations. Reauthorizing the antlerless moose season in this subunit would provide additional opportunity for Federally qualified subsistence users who can receive a State AM550 or DM549 permit to harvest an antlerless moose on State managed lands.

Antlerless moose harvest is limited by annual quotas and the number of permits available. According to ADF&G estimates, the moose population in Unit 15C is stable and within management objectives (Herreman 2022) and the moose population can withstand restricted cow harvest. Because there are such high densities of moose in the area, large snow events may concentrate moose on or near human habitats and roadways, creating negative interactions with humans. Having the flexibility to manage this moose population via drawing permit and targeted hunts allows ADF&G to maintain the moose population at sustainable levels.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 128.

Rationale: Federally qualified subsistence users benefit from the additional opportunity of State managed antlerless moose hunts. These hunts allow take of a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will also maintain management flexibility within the unit, mitigating moose-vehicle collisions and other negative moose-human interactions.

Literature Cited

Herreman, J. 2022. Moose management report and plan, Game Management Unit 15: Report period 1 July 2015-30 June 2020, and plan period 1 July 2020-30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-24, Juneau, AK.

**PROPOSAL 133 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.**

Prohibit the taking of black bear from boats in Unit 15C.

Current Federal Regulations:**§ 100.26 Subsistence taking of wildlife.**

(b) Prohibited methods and means. Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:

(4) Taking wildlife from a motorized land or air vehicle when that vehicle is in motion, or from a motor-driven boat when the boat's progress from the motor's power has not ceased.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: This change would not affect Federally qualified subsistence users hunting on Federal public lands, as harvesting black bear from a motor-driven boat is currently allowed under Federal regulations as long as the boat is not under propulsion from the engine. However, as no Federally managed land borders any of Kachemak Bay or Cook Inlet in Unit 15C, Federal users may only harvest in this manner in Tustumena Lake. Therefore, adopting this proposal would reduce Federally qualified subsistence users' ability to harvest bears when hunting under State regulations.

Adopting this proposal may reduce the number of black bears harvested in Unit 15C, although there are no conservation concerns for black bear in Unit 15C. OSM also recognizes land ownership in Unit 15C is varied, consisting of private, State, and Federal lands. Therefore, this proposal may reduce law enforcement concerns and trespass issues if bears on private lands are mistakenly shot from boats in Cook Inlet and Kachemak Bay.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 133.

Rationale: This proposal would reduce Federally qualified subsistence users' opportunity to harvest black bears under State regulations, and no conservation concerns exist for Unit 15C black bears.

**PROPOSAL 141 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**

Lengthen the bear baiting season in Unit 7.

NOTE: These comments only apply to lengthening the baiting season for black bears as there is no Federal season or subsistence priority for brown bears in Unit 7.

Current Federal Regulations:**§ 100.26(n)(7)(iii) Unit-specific regulations:**

(A) You may use bait to hunt black bear between April 15-June 15; except in the drainages of Resurrection Creek and its tributaries.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would provide Federally qualified subsistence users with increased opportunities to harvest black bears under State regulations. Adopting this proposal would also misalign State and Federal regulations, increasing regulatory complexity.

Black bear population estimates in Unit 7 are limited to tooth and skull morphometrics from harvested bears, which is not a sensitive metric for detecting population changes (Herreman 2022). While black bears in Unit 7 and 15 are resilient to current harvest pressure, only dramatic changes in the population could be seen in harvest data (Herreman 2022). However, three bear harvest limits and year-round seasons under State and Federal regulations indicate no conservation concerns for Unit 7 black bears. Additionally, the percentage of female bears in the total harvest declined between reporting periods, which may reflect an increase in the black bear population (Herreman 2022). Between Regulatory Years (RY) 2013-17, the number of black bears taken over bait in Unit 7 increased from 31 in RY13 to 47 in RY 17, and accounted for 40% of total harvest on average (Herreman 2022). As only 2% of black bear harvest occurred in April from RY13-RY17, this proposal is not expected to have any impact on the black bear population.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 141 (for black bears).

Rationale: This proposal provides additional hunting opportunity for Federally qualified subsistence users hunting under State regulations. While black bear population data and monitoring are very limited in Unit 7, liberal seasons and harvest limits indicate no conservation concerns.

However, there may be impacts to the brown bear population that OSM did not consider in its evaluation of this proposal.



Literature Cited

Herreman, J. 2022. Black bear Management Report and Plan, Game management Units 7 and 15: Report period 1 July 2013 – 30 July 2018, and plan period 1 July 2018 – 30 June 2023. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2022-22. Juneau, AK. 25pp.

PROPOSAL 143 – 5 AAC 94.044. Permit for hunting bear with the use of bait or scent lures.

Restrict bear bait stations within a half mile of certain structures in Unit 15.

Current Federal Regulations:

§100.26(b) Prohibited methods and means:

. . .

(14) Using bait for taking ungulates, bear, wolf, or wolverine; except you may use bait to take wolves and wolverine with a trapping license, and you may use bait to take black bears and brown bears with a hunting license as authorized in Unit-specific regulations at paragraphs (n)(1) through (26) of this section. Baiting of black bears and brown bears is subject to the following restrictions:

. . .

(v) You may not use bait within one mile of a house or other permanent dwelling, or within one mile of a developed campground or developed recreational facility.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: While reducing the minimum distance between bait stations and certain structures would provide more area in which Federally qualified subsistence users could bait bears, it could also cause public safety concerns. No biological impacts to the bear population are expected from this proposal, although negative human-bear encounters may increase if bears become habituated to feeding at bait stations near areas of high human activity (e.g., developed campgrounds or schools). Adopting this proposal would also misalign State and Federal regulations, increasing regulatory complexity.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 143.

Rationale: Reducing the distance between a bait station location and certain structures may results in public safety concerns.



PROPOSAL 144 – 5 AAC 92.044. Permit for hunting bear with the use of bait and scent lures.

Define “developed recreation facility” and “permanent dwelling” for bear baiting in Units 15 and 7.

Current Federal Regulations: None

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: The proposal would provide clarity for Federally qualified subsistence users baiting bears under State regulations, alleviating some law enforcement concerns. However, this proposal would misalign State and Federal regulations and ambiguity could still occur for law enforcement officers and users baiting bears under Federal regulations as these terms are not defined in Federal regulation. This proposal would not have any effect on bear populations.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 144 **with modification** to develop statewide definitions for these terms.

Rationale: OSM supports clarifying State regulations for Federally qualified subsistence users when bear baiting but notes similar definitions do not currently exist under Federal regulations. OSM also encourages the Board of Game to consider developing statewide definitions for these terms instead of only for Units 7 and 15.

PROPOSAL 155 – 5 AAC 92.550 Areas closed to trapping.

Close Unit 15C to beaver trapping.

Current Federal Regulations:

Unit 15—Beaver

20 beaver per season

Nov. 10-Mar. 31.

Kenai NWR Regulations: Trapping on the Kenai NWR requires a refuge permit.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would reduce Federally qualified subsistence users’ opportunities to harvest beavers under State regulation. According to trapper questionnaires, beavers are considered scarce across Region II and reported harvest in Unit 15C has only averaged 3 beavers/year from 2016-2021, although the total number of beavers sealed in Region II is much higher (Bogle 2022). Currently, no empirical data on the status of the Unit 15C beaver population is



available, although Unit 15C beaver harvest has declined to low levels (Eskelin 2023, pers. comm.). Therefore, the effects of this proposal on the Unit 15C beaver population are unknown.

One alternative to consider is to shorten the season to align with current Federal regulations rather than a complete closure. This alternative also reduces regulatory complexity. OSM supports conservation measures if beaver populations are declining, but considers a full closure as too sweeping at this time.

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

Rationale: Adoption of this proposal would eliminate Federally qualified subsistence users’ opportunities to harvest beavers in Unit 15C under State regulations. While there may be conservation concerns for Unit 15C beavers, OSM supports shortening seasons or reducing harvest limits before instituting a complete closure, especially given the low harvest in Unit 15C.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

Eskelin, T. 2023. Wildlife Biologist. Personal communication: e-mail. Kenai National Wildlife Refuge, USFWS. Soldotna, AK.

PROPOSAL 157 – 5 AAC 84.270. Furbearer trapping.

Shorten the beaver trapping season in Unit 7.

Current Federal Regulations:

Unit 7—Beaver

20 beaver per season

Nov. 10-Mar. 31.

Kenai NWR Regulations: Trapping on the Kenai NWR requires a refuge permit.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would reduce Federally qualified subsistence users’ opportunity to harvest beavers under State regulation. However, it would still provide more opportunity than the current Federal beaver trapping season. According to trapper questionnaires, beavers are considered scarce across Region II and reported harvest in Unit 7 has only averaged 9 beavers/year from 2016-2021, although the total number of beavers sealed in Region II is much higher (Bogle 2022). Adoption of this proposal may not impact the Unit 7 beaver population due to the relatively low harvest pressure indicated by trapper reports, although the actual number of beavers sealed from Unit 7 since 2016 as well as recent information on the population status of Unit 7 beavers are not readily available.



One alternative to consider is to shorten the season to align with current Federal regulations. This alternative also reduces regulatory complexity.

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

Rationale: Adoption of this proposal would reduce Federally qualified subsistence users’ opportunities to harvest beavers under State regulation. OSM supports conservation measures if beaver populations are declining, although the impact of this proposal on the Unit 7 beaver population is unclear.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

PROPOSAL 158 – 5 AAC 84.270. Furbearer trapping.

Shorten the coyote trapping season in Units 7 and 15.

Current Federal Regulations:

Unit 7—coyote

No limit

Nov. 10-Mar. 31

Unit 15—coyote

No limit

Nov. 10-Mar. 31

Kenai NWR Regulations: Trapping on the Kenai NWR requires a refuge permit.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would reduce Federally qualified subsistence users’ opportunity to harvest coyote under State regulations. However, it would align Federal and State coyote trapping season opening dates, reducing regulatory complexity. According to trapper questionnaires, coyotes in Units 7 and 15 are considered scarce to common, and reported harvest averaged 19 coyotes from 2016-2021 (8 in Unit 7 and 11 in Unit 15), although reporting is voluntary and therefore likely an underestimation. There do not seem to be any conservation concerns for coyotes on the Kenai Peninsula, although adopting this proposal may alleviate some regulatory confusion, bycatch and user conflict issues as identified by the proponent.

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

Rationale: Adoption of this proposal would reduce Federally qualified subsistence users’ opportunities to harvest coyotes under State regulations, although it would better align State and Federal regulations. No conservation concerns exist for coyotes on the Kenai Peninsula.



Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

PROPOSAL 159 – 5 AAC 85.057. Hunting seasons and bag limits for wolverine.

Lengthen the wolverine hunting season in Units 7 and 15.

Current Federal Regulations:

Unit 7— Wolverine

I wolverine

Sept. 1-Mar. 31

Unit 15— Wolverine

I wolverine

Sept. 1-Mar. 31

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would provide Federally qualified subsistence users with additional hunting opportunity to harvest wolverines under State regulations. However, it would misalign State and Federal regulations, increasing regulatory complexity.

According to trapper questionnaires, wolverines in Units 7 and 15 are considered scarce and reported harvest is low (Bogle 2022). Wolverines warrant conservative management strategies due to low reproductive rates, inherently low population densities from large home ranges, and susceptibility to harvest pressure (Krebs et al. 2004). However, adoption of this proposal would likely have little impact on the wolverine population as the trapping harvest limit is ‘no limit’, while hunters may only harvest one; reported harvest is minimal; and most wolverines are generally harvested via trapping versus hunting (Bogle 2022).

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

Rationale: Adopting this proposal would provide additional opportunity for Federally qualified subsistence users hunting under State regulations. Wolverine harvest and conservation concerns for both units appear minimal.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

Krebs, J. et al. 2004. Synthesis of survival rates and causes of mortality in North American wolverines. *Journal of Wildlife Management*. 68(3):493-502.



PROPOSAL 160 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Limit beaver trapping to one set per lodge for Units 7 and 15 and require visual markers.

Current Federal Regulations:

Unit 7— beaver

20 beaver per season

Nov. 10-Mar. 31

Unit 15— beaver

20 beaver per season

Nov. 10-Mar. 31

Kenai NWR Regulations: Trapping on the Kenai NWR requires a refuge permit.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would reduce Federally qualified subsistence users’ opportunities to harvest beavers under State regulation, and burdens them with additional regulatory requirements. This proposal is consistent with the specific conditions in the special use permit required to trap beavers in Unit 15A on Kenai National Wildlife Refuge.

According to trapper questionnaires, beavers are considered scarce across Region II and reported harvest in Units 7 and 15 has only averaged 17 beavers/year from 2016-2021, although the total number of beavers sealed in Region II is much higher (Bogle 2022). Adoption of this proposal may not impact the Kenai Peninsula beaver population due to the relatively low harvest pressure indicated by trapper reports, although the actual number of beavers sealed from Units 7 and 15 since 2016 as well as recent information on the population status of Kenai Peninsula beavers are not readily available.

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

Rationale: OSM is neutral on this proposal because although it would reduce opportunity for Federally qualified subsistence users under State regulations and puts a burden on Federally qualified subsistence users, it may help conserve beavers and increase their population to provide more opportunity in the future. OSM supports conservation measures if beaver populations are declining, although the impact of this proposal on the Kenai Peninsula beaver population is unclear.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.



PROPOSAL 162 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Extend the ptarmigan season in a portion of Unit 15C to March 31.

Current Federal Regulations:

Unit 15C—Ptarmigan

Unit 15C - 20 per day, 40 in possession *Aug. 10-Dec. 31*

Unit 15C - 5 per day, 10 in possession *Jan. 1-Mar. 31*

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would provide Federally qualified subsistence users with additional hunting opportunity to harvest ptarmigan under State regulations. It would also align State and Federal ptarmigan season dates in Unit 15C, reducing regulatory complexity. The additional three months would increase harvest pressure on the ptarmigan population but are not expected to negatively affect overall Unit 15C ptarmigan populations as ptarmigan species are anticipated to have abundant populations across the Kenai Peninsula (Merizon 2022).

However, localized reductions in ptarmigan populations in easily accessible areas such as along roadways and trails are possible. Merizon (2022) reports poor chick survival for willow ptarmigan in 2021 on the Kenai Peninsula. Before the State season was shortened in 2015, over 50% of the Unit 15 ptarmigan harvest occurred in February and March (ADF&G 2015). Therefore, extending the season back to March 31 would likely result in significant increases in harvest. The weather is more favorable, days are longer, and ptarmigan begin breeding behaviors, making them more susceptible to harvest (ADF&G 2015).

An alternative to consider is to extend the season in portions of Unit 15C that are harder to access, while maintaining the shorter season along roadways and trails.

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

Rationale: This proposal would provide additional opportunity for Federally qualified subsistence users hunting under State regulations. While conservation concerns for unit-wide ptarmigan populations are minimal due to abundant Unit 15C ptarmigan populations, caution may be warranted for ptarmigan occurring in easily accessible areas.

Literature Cited

ADF&G. 2015. Alaska Department of Fish and Game Staff Comments. Southcentral Region II Proposals. Alaska Board of Game Meeting. Anchorage, AK. March 13-17, 2015.

Merizon, R. A. and C.J. Carroll. 2022. Small Game Summary 2022. Alaska Department of Fish and Game, Juneau AK.



PROPOSAL 173 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 13A.

Current Federal Regulations:

Unit 13 – Moose

*Unit 13E - 1 antlered bull moose by Federal registration permit only; Aug. 1-Sep. 20.
only 1 permit will be issued per household*

Unit 13, remainder - 1 antlered bull moose by Federal registration permit only Aug. 1-Sep. 20.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users hunting under State regulations, although opportunity is limited as this is a drawing hunt with a limited, small number of permits. As stated by ADF&G in their proposal, the Unit 13A moose population was above State management objectives in 2021 and can sustain limited antlerless moose harvest. The hunt is closely managed through permit numbers, which, as ADF&G states in their proposal, ensures sustainable harvests at no more than 1% of the cow population.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 173.

Rationale: The Unit 13A moose population currently meets the State’s objective for population size. Because the number of antlerless moose permits issued in Unit 13A is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population, yet provides an important management tool to local managers. It also provides additional harvest opportunities to Federally qualified subsistence users.

PROPOSAL 174 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 13C.

Current Federal Regulations:

Unit 13 – Moose

*Unit 13E - 1 antlered bull moose by Federal registration permit only; Aug. 1-Sep. 20.
only 1 permit will be issued per household*



Unit 13, remainder - 1 antlered bull moose by Federal registration permit only

Aug. 1-Sep. 20.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users hunting under State regulations, although opportunity is limited as this is a drawing hunt with a limited, small number of permits. As stated by ADF&G in their proposal, the Unit 13C moose population has reached abundance levels for which cow moose harvest is necessary to stabilize the population at a more productive level. The hunt is closely managed through permit numbers, which, as ADF&G states in their proposal, ensures sustainable harvests at no more than 1% of the cow population.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 174.

Rationale: The Unit 13C moose population currently exceeds the State’s objective for population size. Because the number of antlerless moose permits issued in Unit 13C is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population, yet provides an important management tool to local managers. It also provides additional harvest opportunities to Federally qualified subsistence users.

PROPOSAL 175 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 13E.

Current Federal Regulations:

Unit 13 – Moose

Unit 13E - 1 antlered bull moose by Federal registration permit only; only 1 permit will be issued per household *Aug. 1-Sep. 20.*

Unit 13, remainder - 1 antlered bull moose by Federal registration permit only *Aug. 1-Sep. 20.*

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users hunting under State regulations, although opportunity is limited as this is a drawing hunt with a limited, small number of permits. As stated by ADF&G in their proposal, the Unit 13E moose population has reached abundance levels for which cow moose harvest is necessary to stabilize the population at a more productive level. The hunt is closely managed with a limited number of



permits available, which, as ADF&G mentions in their proposal, helps maintain a sustainable harvest of cows to keep the population and composition ratios within objectives.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 175.

Rationale: The Unit 13 moose population currently above the State’s objective for population size. Because the number of antlerless moose permits issued in Unit 13 is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population, yet provides an important management tool to local managers. It also provides additional harvest opportunities to Federally qualified subsistence users.

PROPOSAL 177 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 17A.

Current Federal Regulations:

Unit 17A - Moose

Unit 17A – 1 bull by State registration permit *Aug. 25 – Sept. 25*

OR

1 antlerless moose by State registration permit *Aug. 25 - Sept. 25*

OR

Unit 17A – up to 2 moose; 1 antlered bull by State registration permit, 1 antlerless moose by State registration permit. *Up to a 31-day season may be announced between Dec. 1 – last day of Feb.*

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adopting this proposal maintains harvest opportunity for Federally qualified subsistence users. No conservation concerns exist as the antlerless season is in-line with the Unit 17A Moose Management Plan (Barten 2018), and according to ADF&G in their proposal, the Unit 17A moose population is growing and can support additional harvest.

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

Rationale: No conservation concerns exist and harvest opportunity for Federally qualified subsistence users would be maintained.



Literature Cited

Barten, N. 2018. Moose Management Report and Plan, Game management Unit 17: Report Period 1 July 2010 – 30 June 2015, and Plan Period 1 July 2015 – 30 June 2020. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2018-49. Juneau, AK.

PROPOSAL 178 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 18.

Current Federal Regulations:

Unit 18—Moose

Unit 18, south of the Eek River drainage and north of the Goodnews River drainage - 1 antlered bull by State registration permit Sep. 1-30.

Unit 18, Goodnews River drainage and south to the Unit 18 boundary - 1 antlered bull by State registration permit Sep. 1-30.

or

1 moose by State registration permit A season may be announced between Dec. 1 and the last day of Feb.

Unit 18, remainder - 3 moose, only one of which may be antlered. Aug. 1-Apr. 30. Antlered bulls may not be harvested from Oct. 1 through Nov. 30

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose populations. In Unit 18 remainder, where the moose population is large and growing, antlerless hunts provide additional harvest opportunity for Federally qualified subsistence users as well as a mechanism to check the rapid growth of this population, which may be above carrying capacity. The antlerless season in the Goodnews River drainage provides additional opportunity for Federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics, and is closely managed through harvest quotas.

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



Rationale: Antlerless moose hunts are an important aspect of moose management in much of Unit 18 and increase hunting opportunity for Federally qualified subsistence users.

PROPOSAL 179 – 5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.

Reauthorize a winter antlerless moose season during February in a portion of Unit 19D.

Current Federal Regulations:

Unit 19D - Moose

Unit 19D – that portion of the Upper Kuskokwim Controlled Use Area within the North Fork drainage upstream from the confluence of the South Fork to the mouth of the Swift Fork – 1 antlered bull. *Sept. 1 – Sept. 30*

Unit 19D, remainder of the Upper Kuskokwim Controlled Use Area – 1 bull *Sept. 1 – Sept. 30*

Dec. 1 – Feb. 28

Unit 19D remainder – 1 antlered bull *Sept. 1 – Sept. 30*

Dec. 1 – Dec. 15

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Adopting this proposal maintains harvest opportunity for Federally qualified subsistence users. No conservation concerns exist as the antlerless season is consistent with the Unit 19D Moose Management Plan (Pierce 2018), and according to ADF&G in their proposal, the Unit 19D moose population is exhibiting signs of nutritional stress through decreased twinning rates and in need of stabilization.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 179.

Rationale: Cow harvest is warranted based on declining twinning rates, and harvest opportunity for Federally qualified subsistence users would be maintained.

Literature Cited

Pierce, J. 2018. Moose Management Report and Plan, Game management Unit 19: Report Period 1 July 2010 – 30 June 2015, and Plan Period 1 July 2015 – 30 June 2020. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2018-22. Juneau, AK.



PROPOSAL 180 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20A.

Current Federal Regulations:

Unit 20A—Moose

1 antlered bull

Sep. 1-20.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose under State regulations. According to ADF&G in their proposal, these antlerless moose hunts may have beneficial effects on the Unit 20A moose population, which is high density with concerns over nutritional stress if not stabilized. ADF&G closely manages and monitors these antlerless hunts. Because the number of antlerless permits issued for the Unit 20A hunt is adjusted annually, accounting for current population metrics, there is little threat to the conservation status of this moose population.

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

Rationale: Antlerless moose hunts are an important management tool in Unit 20A for maintaining moose populations at sustainable levels. Reauthorizing the Unit 20A antlerless moose season provides additional harvest opportunities to Federally qualified subsistence users with no conservation concerns.

PROPOSAL 183 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20E.

Current Federal Regulations:

Unit 20E—Moose

Unit 20E, that portion within Yukon-Charley Rivers National Preserve - Aug. 20-Sep. 30
1 bull

Unit 20E, that portion drained by the Middle Fork of the Fortymile Aug. 20-Sep. 30
River upstream from and including the Joseph Creek drainage - 1 bull

Unit 20E, remainder - 1 bull by joint Federal/State registration permit Aug. 20-Sep. 30

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.



Impact to Federal subsistence users/wildlife: This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose under State regulation. According to ADF&G in their proposal, these antlerless moose hunts may have beneficial effects on the Unit 20E moose population, which is at risk of damaging habitat if growth of the female component of the population is not curtailed. ADF&G closely manages and monitors these antlerless hunts through limited drawing permits. Because the number of antlerless permits issued for the Unit 20E hunt is adjusted annually, accounting for current population metrics, there is little threat to the conservation status of this moose population.

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

Rationale: Antlerless moose hunts are an important management tool in Unit 20E for maintaining moose populations at sustainable levels. Reauthorizing the Unit 20E antlerless moose season provides additional harvest opportunities to Federally qualified subsistence users with no conservation concerns.

PROPOSAL 184 – 5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.

Reauthorize a winter antlerless moose season during March in a portion of Unit 21D.

Current Federal Regulations:

Unit 21 – Moose

Unit 21D, that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek - 1 moose by State registration permit Aug. 22-31.
Sep. 5-25.

Antlerless moose may be taken only during Sep. 21-25 season if authorized jointly by the Koyukuk/Nowitna/Innoko NWR Manager and the BLM Central Yukon Field Office Manager. Antlerless moose may be harvested during any of the winter seasons. Harvest of cow moose accompanied by calves is prohibited Mar. 1-31 season may be announced.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Reauthorizing this antlerless season would maintain opportunity for Federally qualified subsistence users and easier access to moose habitat closer to rural communities. Additionally, reauthorization would maintain alignment between State and Federal regulations, reducing regulatory complexity and law enforcement concerns, which is especially important in this hunt area given the checkerboard pattern of land ownership.

The Unit 21D moose population has been stable, within State management objectives and can sustain limited antlerless moose harvest (Bryant 2022). The USFWS conducted surveys in 2022, indicating stable



moose populations that are above the long-term average and recommended to maintain the harvest opportunity for Federally qualified subsistence users (Bryant 2022).

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 184.

Rationale: No conservation concerns exist as the moose population in Unit 21D is healthy enough to sustain antlerless moose harvest. Also, the additional opportunity to harvest moose closer to rural communities under State regulations benefits Federally qualified subsistence users.

Literature Cited

Bryant, Jenny. 2022. Moose Trend Survey Summary 2022. USFWS. Galena, AK. 34 pp.

PROPOSAL 185 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

Reauthorize a winter antlerless moose season during part of February and March in Unit 21E.

Current Federal Regulations:

Unit 21 – Moose

Unit 21E - 1 moose; however, only bulls may be taken Aug. 25-Sep. 30 Aug. 25-Sep. 30.

During the Feb. 15-Mar. 15 season, a Federal registration permit is required. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee as stipulated in a letter of delegation. Moose may not be taken within one-half mile of the Innoko or Yukon Rivers during the winter season Feb. 15-Mar. 15.

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Reauthorizing this antlerless season would maintain opportunity for Federally qualified subsistence users and easier access to moose habitat closer to rural communities. According to ADF&G in their proposal, the Unit 21E moose population is starting to show signs of nutritional stress due to higher population levels. The latest population estimation from ADF&G is 9,777 moose, which is within population objectives, and declining twinning rates indicate that this moose population could benefit from antlerless harvest.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 185.



Rationale: No conservation concerns exist as the moose population in Unit 21E may benefit from some antlerless moose harvest. Also, the additional opportunity to harvest moose closer to rural communities under State regulations benefits Federally qualified subsistence users.

PROPOSAL 186 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast.

Current Federal Regulations:

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

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

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

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

PROPOSAL 187 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

See comments for Proposal 186.

PROPOSAL 188 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23, and 26A.

See comments for Proposal 186.



PROPOSAL 204 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Close resident and nonresident hunting for Dall sheep in Unit 19C, for five years.

Current Federal Regulations:

Unit 19 – Sheep

Sheep: 1 ram with 7/8 curl horn or larger *Aug. 10-Sep. 20.*

Unit 19C, that portion within the Denali National Park and Preserve-residents of Nikolai only - no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system. *Oct. 1-Mar. 30.*

Is a similar issue being addressed by the Federal Subsistence Board? No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently harvest a 7/8 curl ram in Unit 19 under Federal regulations. Adopting this proposal would not affect that opportunity. A similar proposal could be submitted to the Federal Subsistence Board, although Federal public lands only comprise 17% of Unit 19C. Sheep hunting opportunity for Federally qualified subsistence users hunting under State regulations in Unit 19C would be eliminated for at least five years if this proposal were adopted. However, giving this sheep population time to recover and increase could provide more harvest opportunity to Federally qualified subsistence users in the future.

Closing Unit 19C to the harvest of sheep may allow for recovery of the sheep population in the unit by eliminating harvest pressure. Both hunted and nonhunted sheep populations in and around Unit 19C have decreased in concert with each other, by approximately 50% since around 2017. Sheep population estimates within Denali National Park and Preserve have decreased since 2019 (Borg 2023, pers. comm.) paralleling the declining population trend in adjacent Unit 19C.

ADF&G survey data indicates about a 60% decrease in abundance since 2017 when minimum count surveys reported over 500 individuals, compared to the latest minimum count from 2022, which only recorded about 200 individuals. Lamb production has also dropped off considerably since 2017, when about 120 lambs were counted, whereas just over 20 were counted in 2022. Harvest of sheep in Unit 19C has also followed this declining trend, decreasing by about 75% in recent years. Almost 120 rams were harvested in 2018, but only about 30 rams were reported in 2022. According to the ADF&G 2022 population composition survey, a small number of legal rams (≤ 10) were identified, indicating few rams available for harvest in 2023 (ADF&G 2022).

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 204.



Rationale: Although opportunity for Federally qualified subsistence users hunting sheep under State regulations in Unit 19C would be eliminated, conservation concerns exist for Unit 19C sheep populations and potential increases in sheep abundance may provide more opportunity for the future. Since total sheep, legal ram, and harvest numbers have all severely decreased in the last five years, continuing to allow harvest from this population may exacerbate conservation concerns.

Literature Cited

Alaska Department of Fish and Game. 2022. Board of Game Sheep Informational Meeting. Presentation. ADF&G DWC. Juneau, AK. 56 pp.

Borg, B. 2023. Wildlife Biologist. Denali National Park and Preserve. Personal communication: e-mail. National Park Service, Healy, AK.



Submitted by: Bjorn Olson

Organization Name:

Community of Residence: Homer

Comment:

I support Proposal 160.

Although the warmth and comfort of a well-tanned beaver pelt cannot nor should not be diminished, live beavers, in their historic numbers, with the myriad ecological services they provide, must also not be overlooked.

As the western Kenai Peninsula continues to dry out, beavers help preserve water—water that now falls in more intense rain events. A robust population of beavers on the Kenai are an insurance policy, helping guard us from future droughts like we saw in the summer of 2019. Furthermore, the wetlands they create aid in forest fire mitigation.

When beaver populations are allowed to flourish, upland salmon and trout nurseries also flourish. Throughout the West, massive and expensive efforts are underway to re-wild incised streams and rivers using Beaver Dam Analogues and the re-introduction of live beavers. These costly efforts would not be necessary if the native beaver populations had been well-managed in the first place.

I would like to believe that it is possible to retain our customary practice of trapping while also working to improve ecological conditions here on the Kenai by encouraging robust beaver populations. Proposal 160 seems like a decent compromise toward these dual goals.

-Bjørn Olson

Homer, Alaska



Submitted by: Allison Ostrer

Organization Name:

Community of Residence: Seattle, WA

Comment:

I support Proposal #145 to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass. The highway construction plans include multiple wildlife underpasses and Alaska's first wildlife overpass! Fencing will keep wildlife off the road and funnel them through these new crossings, but current regulations allow for hunting and trapping on these crossings. Please make these multi-million dollar crossings safe passages for wildlife.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Support Proposal 160: Support

Cooper Landing, AK Trap Setbacks



PC 237

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.

Please select the proposals that you are in support of (select all that apply).

If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.

- # 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- #149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- # 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- #151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- #152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- #153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- # 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

Other areas setback proposals:

- #146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- #147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- # 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.



Proposal 205

Oppose

Board of Game Members:

My name is Spencer Pape, I'm a resident of Wasilla and have been a big game guide/outfitter(#1302) for 19 years, with the past 12 years in and around the RM653 moose registration area of Farewell, Alaska. I am in strong opposition to proposal 205 as it is written. Through guiding big game hunters, outdoor recreating, and working for Brice Environmental on the remediation of the abandoned Farewell airbase, I spend roughly 70 days afield in 19C alone.

While I am concerned about the moose population around Farewell (RM653) and believe regulations and/or restrictions are in order, I am equally concerned about the blatant disregard shown by users of the Farewell airstrip, surrounding lands, resources, and wildlife in the area. The amount of trash, empty fuel drums, and ATVs left at the taxiway and hidden in the bushes that hunters leave behind is atrocious! I find it extremely embarrassing when I load and offload my clients on the opposite end of the airstrip. The length of the Farewell airstrip, the many ATV trails that spider out from Farewell and its relatively closeness to Anchorage, make it a moose hunting magnet for residents and nonresidents alike to fly out their ATVs and camping gear in large cargo planes for an easy moose hunt. My predecessor, John Latham, started hunting the Farewell area in 1968 and described the area as the best kept secret up until the mid-90s. Since the influx of hunters in the 90s, he has described the month of September as "the rat race", with four wheelers zipping all around and a mentality of "if it has horns, it's going down". Over the past three decades the moose seasons have been shortened and horn restrictions put in place to maintain a healthy moose herd within the area to try to combat this practice. The registration permit area RM653 was created to achieve a more accurate grasp on the number of hunters and moose harvested within the Farewell area. RM653 is 3 years old and is made up of roughly 325 square miles with the Farewell airstrip sitting near the center of the hunt area. The registration permit area also sits near the center of guide use area 19-09, which at this time has two licensed guide/outfitters, myself and one other, registered for the area according to the Big Game Commercial Services database. This past season, 2022, saw the highest number of permits issued to date at 201 with 106 legal bulls and eight sublegal bulls harvested. Historically, users are made up of 55% residents and 45% nonresidents with the moose harvest being about the same percentages of resident versus nonresidents. This past season saw 107 residents and 94 nonresidents, with 56 bulls harvested by residents and 50 by nonresidents, according to the Alaska Department of Fish and Game (ADF&G). My outfit guided 2 nonresident moose hunters into the RM653 hunt area and harvested one bull. According to ADF&G, the bull to cow ratio is 30 to 100 in the Farewell area currently. The bottom threshold for the area is 25 to 100. In more remote inaccessible areas, the bull to cow ratio is 60-80 to 100 according to the article "Recovery of Low Bull: Cow Ratios of Moose in Interior Alaska" by Young and Boertje (2008). According to ADF&G personnel, to get the bull ratio back up, a cap needs to be put on the number of bulls harvested within the registration area and that number is 60 bulls per year. Limiting nonresidents to 20 draw permits per this proposal will not solve the problem and ensure the goal of only harvesting 60 bulls. Hypothetically, if the area did go to a nonresident draw of 20 tags, twenty nonresidents plus 107 residents (2022 number) allows for 127 moose hunters. If the success rate stayed the same at 53%, that correlates to 67 bulls being harvested with another five sub legals taken based on historical percentages. However, I predict that the



harvest would be much higher with the area being relatively small, ease of transport by ATV, cutting the hunting pressure half and the number of resident hunters continuing to increase.

A secondary concern is the multiple large camps in the registration hunt area that bring in several hunters (friends, customers, employees, etc.) September 1st through 10th, with a change out halfway through the season and another set of hunters September 11th – 20th. These large camps resemble a guiding and outfitting operation, but without the regulations that would be part of an official outfit. As noted previously, there are only two state licensed outfitter/guides that are registered to conduct big game commercial services in the hunt area.

Another area of concern that I do not think this proposal will positively impact, is the number of sublegal bulls harvested per year. I was told by an ADF&G wildlife trooper some years ago that eight to ten sublegal bulls are taken in the registration area every season. To the novice moose hunter, a 45" to 55" moose is difficult to judge at a distance, especially if it doesn't have the required brow points to make it legal. I can only assume that, with the amount of hunting competition in the area, hunters can feel pressured, or even entitled, to harvest a moose, leading to shots taken when a questionable legal bull walks out. The hunter may pull the trigger to avoid watching the next hunter over take the shot.

To bring the bull to cow ratio and bull moose harvest into the parameters deemed optimal by ADF&G within the registration hunt area, I suggest establishing a moose draw permit for all user groups and mirror the nonresident draw permits to the Unit 21E moose hunt regulations. Unit 21E states that nonresident applicants may only apply for DM837 (nonguided only) or DM839 (guided only), but not both. Second, meat must remain on the bones of the front quarters, hindquarters, and ribs until removed from the field or it has been processed for human consumption. This is already a requirement in 19C. Third, nonresident moose hunters must complete the Nonresident Moose Hunter Orientation online at <http://hunt.alaska.gov> or must be accompanied in the field by an Alaska licensed guide. In accordance with the recommended harvest of 60 bulls and the historical user group history within the hunt area, the distribution of draw tags would be 40 tags to residents, 14 tags to nonguided nonresidents and 6 tags to guided nonresidents.

An event like what we are experiencing now occurred in the late 90s in Unit 24 and the northern section of 21D along the Koyukuk River and could serve as case precedent for the registration hunt area of RM653. Obviously, Unit 24 and 21D are on a much larger scale and include multiple villages, however, the percentages of moose hunters versus successful harvest, and the increase in hunting pressure over a 10-year period, is similar. In 1988 the moose harvest success rate was 60%. Eleven years later, with 731 moose hunters, the success rate had dropped to 50%. In addition to human harvest, a significant increase in the area's wolf population took place during this time that took a large toll on the overall moose herd. The Koyukuk River Moose Management Plan (KRMMP) was developed in conjunction with ADF&G Division of Wildlife Conservation and the Koyukuk River Moose Hunters' Working Group (KMWG or working group). The Alaska Board of Game (BOG) adopted regulatory proposals in the fall of 2000 that were spawned from the working group and in the 2001 spring meeting the BOG voted unanimously to support the process and endorse the KRMMP. The working group established a baseline maximum number of hunters based on moose biology concerns and what is considered a quality hunting experience. The general registration was changed to a drawing hunt with separate resident and nonresident drawing pools. The separate draws were established to retain opportunity for nonresidents and commercial guides based on user group history. The working group met after the close of the 2000



hunting season to review the regulation changes. Members of the working group all agreed that the season was greatly improved and that both local and nonlocal hunters enjoyed a higher quality hunt than in years past. A 2021 moose trend survey summary conducted by the Department of Interior Federal Subsistence Management Program through aerial survey shows a stable and healthy bull to cow moose population.

In closing, it is a supply and demand situation. The current demand on moose in the registration hunt area cannot be sustained with the current moose population and its downward trend. Proposing only to limit nonresidents to 20 draw tags is ignoring the other options that could work in conjunction with this limitation to provide demonstrable results. I would like to urge the BOG to use all options at their disposal to help sustain and maintain moose populations and the moose hunting opportunity for all user groups in the registration hunt area of RM653.

Thank you for your time and dedication to this Board.

Sincerely,

Spencer Pape



Proposal 204

Oppose

Board of Game Members:

My name is Spencer Pape, I'm a resident of Wasilla, and have been a big game guide/outfitter (#1302) for 19 years. I am strongly opposed to proposal 204 as it is written. Through guiding big game hunters, outdoor recreating, and working for Brice Environmental on the remediation of the abandoned Farewell airbase, I spend roughly 70 days afield in 19C alone. While I am concerned about the Dall sheep population in the area, as well as statewide, I'm also concerned with the loss of another hunting opportunity. My predecessor in 19C, John Latham, shared with me nearly 50 years of sheep population cycles, along with a vast knowledge of Western Alaska. He often described the bountiful numbers of sheep in the 70s and then the "lean years" of the late 90s and early 2000s.

Dall sheep populations have shown a cyclical pattern since record keeping began in the 1920s. Per the Alaska Department of Fish & Game (ADF&G) website, *"Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well."*

Through my observations, three out of the last five winters have been detrimental to Dall sheep populations. Due to the inclement winter seasons, coupled with the rise in predator populations, the sheep haven't had it easy. Yes, the population is down, however I observed a huntable and harvestable population of rams on the mountain this past season. As for my outfit, this past Dall sheep season didn't end with every sheep tag being punched, but our observations did inspire optimism for the near future. For the second year in a row, we will again cut back the number of clients that we take into the field for Dall sheep to responsibly manage the area as best we can. Self-regulation, observation, conservation, and client success are what resonates with me. I am not as interested in tally marks on my gun stock or making as much money as possible. ADF&G records show that when a particular game population is low, less hunters will go to the field for that species. Since 2018, the number of Dall sheep hunters going to the field in 19C has decreased some 15-25% per year. This decrease could be due to either hunters staying home or hunting in a different area. A quick search on the ADF&G website indicates that other mountain ranges have seen an increase in sheep hunters since 2018. By closing 19C, other Game Management Units will see a significant rise in sheep hunters, putting more pressure on those Dall sheep populations, thus creating a snowball effect that will ultimately lead to more Dall sheep closure and/or limiting proposals. With the full curl regulation that is in place, I have no doubt that the numbers will come back in 15 to 20 years as shown in the Game Management Unit 20A population data that has been collected after the 1990s decline.

The full curl regulation has been proven to be the best management tool for 30 years now and is the most conservative approach according to ADF&G. Department studies have shown that once a ram surpasses 8 years old, its chances of survival greatly diminish within the wild with very few rams surpassing 12 years of age. Full curl, 8+ year old rams makeup less than 5 % of the overall sheep



population. The harvest of this age class of rams has no effect on the overall sheep population. Furthermore, harvesting these older rams gives the younger adults, which are in their prime, protection from injury during the rutting season.

The high take and sharp increase of sublegal harvest the past few seasons is alarming. Lack of education and entitlement are the two most prominent factors from my perspective. The creation of a mandatory online Dall sheep hunter orientation course, similar to the nonresident moose hunter orientation on the www.hunt.alaska.gov website, for every resident, nonresident, and guide would positively impact this problem. A very informative Full-Curl Identification Guide already exists on the ADF&G website. Turning this material into an orientation course would help educate even the most seasoned sheep hunter. A meaningful penalty should be levied on the take of a sublegal ram and penalty should progress upon further offenses. For example, a monetary fine for the first offense, an increase in the fine and the loss of his/her sheep hunting rights for 1 year for the second offense, and a more significant fine and the loss of his/her sheep hunting rights for 5 years for the third offense, and so on. The online course, coupled with a mandatory penalty for the take of a sublegal ram, would help curb the illegal take and limit the entitlement mindset.

While I understand the purpose of the board, and its decisions, is to put the welfare of the state's game populations first, passionate sheep hunters would rather have the board act constructively to maintain Dall sheep hunting opportunities rather than destructively by completely closing the season. Consider other methods for Dall sheep regulations such as the harvest of one ram every four years for both residents and nonresidents, weapons restrictions for part of the general season, shortening of the general season, and intensive predator control management within the area. The creation of a Dall sheep working group to brainstorm such methods and means in order to come up with the best path forward to Dall sheep conservation would be extremely beneficial to the resource. Previous species-specific working groups, such as the Koyukuk River Moose Hunters' Working Group, have been instrumental in the rehabilitation and both the conservation of the resource and maintaining the hunting opportunity of a species.

I strongly urge the board to be mindful of the Dall sheep hunting opportunities that residents and nonresidents have left and the Dall sheep hunting opportunities that have been lost.

Good day and thank you for your time and dedication to this board.

Respectfully,

Spencer Pape



PC239

Submitted by: David Paperman

Organization Name:

Community of Residence: Seward, Alaska

Comment:

As an Alaskan I support the rights of others to trap for recreation. However, reasonable restrictions must be implemented for the common good. The vast majority of public lands should be open to recreational trapping. However, it is completely reasonable to restrict this activity on small corridors of land which receive high levels of use in our increasingly popular and growing rural communities like Seward, Cooper Landing and Moose Pass. Relatively narrow corridors along popular and demarcated trails is a reasonable way that all user-groups can share our public lands. Signage, education, and small corridors along popular trails can eliminate this conflict almost immediately.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC240

Submitted by: Alan Parks

Organization Name:

Community of Residence: Homer AK

Comment:

PROPOSAL 162 Oppose extending the ptarmigan season two months longer. They have just begun to grow back will mean managing ptarmigan at a depressed level

PROPOSAL 163 Oppose Rescinding bag limit restrictions for sea duck hunting in Unit 15C

Absolutely not. These birds are 90% declined from what they were in the 1980's this would not make sense to take them down further. We began seeing some recovery when these limits were lowered. The habitat is fine.

PROPOSAL 164 & 165 Support lowering goldeneye bags

What are the limited number of goldeneyes doing in the general bag with millions of mallards? Take it down to 2 would be more reasonable and fill in with mallards

PROPOSAL 166 & 167 Support lowering bufflehead bag limits

There are so few in Kachemak Bay it would be nice to have more around

PROPOSAL 168 & 169 Support lowering harlequin

Better to close this. These birds taste terrible but for trophy none needs to take more than one

PROPOSAL 170 Support lowering long tail duck bag

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support



PC241

Submitted by: Sara Pate

Organization Name:

Community of Residence: Anchorage ak

Comment:

#145, support buffer at wildlife crossing. When we concentrate wildlife at this area we should not be allowing traps also. Unfair to the animals

#149. Setbacks are good. Children and pets are likely to be roaming around camgrounds

#150. Setbacks from pullouts are good. People and animals are likely to step off the pullout to go to the bathroom and should be safe from traps

#151 setback from summit lake recreation area. People and pets are likely to be roaming around and should not have to worry about traps

#152 setback from high use cooper landing trails are good. People and pets are likely to be roaming around and should not have to worry about traps

#153 setbacks from beaches are very important. As a cabin owner, my family and I enjoy using the beaches and my children and pets should not have to worry about traps if they are building a fort in the woods

#154 trapping signage is important to warn recreations of hazards

#146, 147, 148, setbacks in all red areas are important. People and pets are likely to be roaming around and should not have to worry about traps

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC242

Submitted by: Scott Pate

Organization Name:

Community of Residence: Cooper Landing

Comment:

I support Proposals #145 thru #154.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC243

Submitted by: Cora Patton

Organization Name:

Community of Residence: Homer, Ak

Comment:

in favor of proposal 132 getting rid of the sealing requirements.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 132: Support



Submitted by: Laramy Paulson

Organization Name:

Community of Residence: Talkeetna, Alaska

Comment:

Proposal number 146-152 Cooper landing trap set backs.

I oppose these proposals because all it does is make it harder for the trapper. As a trapper myself the farther I trap from my trail the more lure and rotten bait I use to pull the critters in and as we all know 50-100 yards means nothing to a dog if it stinks they will go to it end of story. Not to mention there will be a perfect foot path from said trail to set which makes it easier for a pet too get to the set in the first place. These proposals will not save a pets life but they will make it harder and less productive for trappers

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose



Submitted by: Bryse Payment

Organization Name:

Community of Residence: Nikiski Alaska

Comment:

These are my thoughts

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 56: Oppose Proposal 57: Support Proposal 58: Support Proposal 59: Oppose Proposal 60: Oppose Proposal 62: Oppose Proposal 64: Support Proposal 65: Oppose Proposal 66: Oppose Proposal 67: Oppose Proposal 68: Oppose Proposal 69: Oppose Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Oppose Proposal 74: Oppose Proposal 75: Support Proposal 76: Support Proposal 77: Support Proposal 78: Oppose Proposal 79: Support Proposal 80: Support Proposal 81: Oppose Proposal 82: Support Proposal 84: Oppose Proposal 85: Oppose Proposal 86: Support Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Oppose Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Support Proposal 97: Support Proposal 98: Support Proposal 99: Support Proposal 100: Support Proposal 102: Support Proposal 103: Support Proposal 104: Oppose Proposal 105: Oppose Proposal 106: Support Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 115: Oppose Proposal 116: Support Proposal 119: Oppose Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 125: Support

Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Support Proposal 129: Support Proposal 131: Support Proposal 132: Support Proposal 133: Oppose Proposal 134: Support Proposal 135: Support Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 140: Oppose Proposal 141: Support Proposal 142: Support Proposal 143: Support Proposal 144: Support Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Oppose Proposal 159: Support Proposal 160: Oppose Proposal 162: Support Proposal 173: Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Support Proposal 183: Support Proposal 200: Oppose Proposal 203: Support



PC246

Submitted by: Dolly Peach

Organization Name:

Community of Residence: Salt Lake City, Utah

Comment:

Hello. I am a landowner in Sadie Cove, Alaska with my family. We have owned our property there since 1978. We have seen changes in the ecosystem over time and a decline in the biodiversity of species. There does not seem to be a way to control the total amount of sea ducks being harvested and accurate methods of reporting. Therefore, we SUPPORT proposals reducing bag limits of Goldeneye, Bufflehead, Harlequin & Long-tailed Duck.

SUPPORT Proposal 164-170, 171, 172

OPPOSE Proposal 163

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support



PC247

Submitted by: Patricia Peach

Organization Name:

Community of Residence: Anchorage AK

Comment:

I support Proposals 164, 166 169, 171. I oppose Proposal 163.

Since 1978 we have had cabins in Sadie Cove. Though I am not a scientist I have decades of observing the ecosystem changes. The early years Sadie Cove had king crab at the head in late winter. We had crab shrimp clams and mussels for subsistence food. All are now unavailable. Sadie Cove is a fragile ecosystem. We enjoy the duck migration in March and

April. It is my strong belief that the proposals I support such as recording sea duck populations, harvesting and surveying data will assure our sea duck populations will survive.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 163: Oppose Proposal 164: Support Proposal

166: Support Proposal 169: Support Proposal 171: Support



PC248

Submitted by: Alexis Peacock

Organization Name: Peacock Family

Community of Residence: Kodiak

Comment:

To Whom It May Concern,

I support Kodiak Area Unit 8 proposal 76 which seeks to extend the bear hunting season on the Kodiak road system.

Due to the increase in bear encounters, I would like to support the extension of the bear hunting system on the road system to help reduce the problems with bears we have had in our neighborhood.

This last fall there were multiple bears on many different occasions in which our dumpster and neighbors dumpsters were broken into. There were three different occasions when I had to call Peterson Elementary to notify them there were bears near the student pick up area.

Please consider extending the hunt for the safety of our neighborhood and children going to a from school.

Thank you,

Alexis Peacock

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 76: Oppose



PC249

Submitted by: Erin Pearce

Organization Name:

Community of Residence: Seward, AK

Comment:

It is important to save our pets and children. Traps should not be near heavily trafficked area.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC250

Submitted by: Heather Pearson

Organization Name:

Community of Residence: Cooper Landing

Comment:

I oppose proposals 149-153 because these proposals don't address the data-driven management of a wildlife resource. They don't address a public safety issue. These proposals attempt to address a social issue. For these reasons, these proposals are asking for something that falls outside of the purview of the mission of the Alaska Board of Game.

The proponents of this proposal package falsely attribute wide community support. However, the majority of recipients of their survey did not respond. Cooper Landing Safe Trails reports that they received 135 responses from 420 households that were sent a survey. So, about 68% of the households in the Cooper Landing community did not respond.

These proposals do not include any data regarding the polling of the community, including methods of the survey, how the data was collected, or what the results of the poll were. These proposals also do not include any specific data regarding the date, time, or location of any specific incidents.

I do support signage as requested by proposal 154, but with amendments. It is written poorly and perhaps the BOG can amend this proposal in a way that makes sense. It is important to educate the public to increase their awareness and understanding that traps may be present in an area and may pose a potential risk to loose (or "voice command") dogs, so that these folks may be informed enough to accept the risk and responsibility of keeping their dogs safe.

Thank you for your time and dedication to the management of Alaska's game.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Support with Amendment
