



Comments on Proposal 62, Proposal 63 and Proposal 64 We oppose Proposals 62, 63, and 64 to allow an Antlerless Moose hunt to be reauthorized annually to allow for limited cow hunt, to reduce moose population in Unit 13 or subunit(s) of Unit 13. This proposal request is submitted annually and isn't necessary to do so. Cow moose could be shot incidentally; leaving calves orphaned and allowed to be preyed upon by predators. Cow population can be managed on its own. Cow moose will be killed by predators reducing the population naturally and without intervention from management. To reduce moose population a longer moose hunting season is needed to kill Bull Moose before rutting season occurs. A moose hunt before the rutting season from August 1 – September 27 for moose will aide in reducing the cow moose population. The public will not know the number of permits to be distributed because the latest data will be gathered just before ABOG meeting. We know that a substantially lower number, less than 200 permits will be announced, but the number of permits isn't certain. A cow moose hunt will interfere with the community subsistence hunt. More hunters will be in Unit 13A hunting for cow moose, Bull Moose and caribou. Extrapolation counts and sight ability counts are estimates of the moose population; it isn't an exact count of the moose population. Moose population in Unit 13A may be less than estimated extrapolated numbers and sight ability counts. Moose will migrate and find other areas to find food to feed themselves, if there are too many moose in one area. They will not starve from over grazing an area. Regulating triggers when moose populations are above population objectives in all of Unit 13 will not be an effective tool to manage moose for all the reasons previously mentioned above.

Allowing a 1% take of cow moose in Unit 13A, 13B, 13C and 13E with zones created for each hunt area for residents only with a fall and winter hunt and eliminating drawing hunt will only add another hunting season in Unit 13 in the fall and winter months. Federal and community subsistence hunts for caribou is open until March month. Separate hunting seasons from other moose hunts in created zone hunting areas will create hunting conflicts with CSH and federal caribou hunting season.

Youth can hunt during regular hunting season and continue hunting patterns and practices during the CSH hunt. The proposed hunting season, August 5-15 is too early in the season to hunt, especially if a family has to travel over 100 miles to hunt, meat will spoil, if it is not cared for or put into a freezer soon after it is harvested. An early cow moose hunting season in Unit 13A will add more hunting pressure in Unit 13A. It will be held when CSH hunt for caribou and moose season will be occurring. It will create unsafe hunting conditions for youth to hunt in, more conflicts will occur in the field with more and more hunters out stalking a cow moose and bull moose.

Hunters who travel from urban areas has to haul moose back to their homes during the early part of August month will spoil cow moose meat, when it is too warm to kill a moose. Cow moose meat will spoil unnecessarily, when moose is killed during warm August month. Weather conditions in Unit 13 are staying warmer into late fall months.

Comments Proposal 70. (These comments also relate to proposals 62, 63 and 64)

We oppose Proposal 70 (see proposal 71 for a hunt that we support) to allow a general moose hunt in Unit 13 for Nonresidents that will only bring more hunters into the field during the CSH and federal hunting season. If the drawing permits are not being fully utilized now, then a general moose hunting season will not draw more nonresidents out to hunt for a moose. Nonresident hunters do not follow or have C&T use patterns or practices, nor do they need the meat to sustain their livelihood. They are out hunting for the enjoyment of taking trophy moose antler. Any Bull Moose in Unit 13 was reduced due to over harvesting and has created a hardship for hunters to harvest a moose; more hunters in the field will reduce the opportunities to harvest a moose.

Comments on Proposal 71. **We support Proposal 71** to allow a Nonresident hunt with a 150 permits in Unit 13B outside a five mile corridor alongside the Richardson Highway so that they have a hunting area to hunt for moose. This will avoid conflict with the community subsistence hunt, federal hunting areas and hunting seasons. This proposal will close all other subunits of Unit 13 to Nonresident hunting and alleviate impact to community subsistence hunt and other hunts. More smaller Bull Moose will sought after and be taken by CSH hunters along the highway system for those who cannot travel off the road system to hunt and harvest a moose or caribou.

Comments on Proposals – 65, 67, 68-69 will be submitted under a separate RC

Comments on Proposal 66 **We oppose Proposal 66** to repeal the Community Harvest (Tier I) moose hunt and area, and replace it with a registration hunt outside of a newly created road corridors in Unit 13, and closing season when harvest objective is met. Proposal 66 will repeal community subsistence harvest hunt. Efforts made by the Board of Game to establish a customary and traditional use hunt patterned after Ahtna's C&T use and patterns will be undone. The community subsistence hunt is a hunt that provides a longer hunting opportunity, complies with subsistence laws, and is designed to follow the 8 criteria, patterned after Ahtna's customary and traditional use of the resources.

The proposal does not establish a boundary along highway corridors in Unit 13. It would be difficult for ADF&G to manage this hunt. Moose surveys are not done along road corridors. Currently there aren't drawing permit hunts for Any Bull along the road system in Unit 13. Over harvest of bull moose would occur if this proposal is adopted.

Comments on Proposal 67 **We oppose Proposal 67** to repeal the community subsistence harvest hunt and conditions and establish a weighted subsistence drawing hunt. Replacing CSH Unit 13 Caribou season with drawing permit will not change equality of hunting, everyone one can choose to hunt under a Tier I caribou hunt or CSH caribou hunt in Unit 13. CSH hunt will be overturned and the Board's effort toward creating a hunt based upon Ahtna C&T patterns and use will be undone.

Comments on Proposal 68 We support Proposal 68. See comments after proposal 69 for why we support proposal 68.

Comments on Proposal 72 and Proposal 73

We are submitting comments under a separate RC on Proposal 72 and Proposal 73

Comments on Proposal 74, Proposal 75, Proposal 76, Proposal 77, Proposal 78
(Brown Bear Baiting)

We support Proposals 74, 75, 76, 77 and Proposal 78 to allow brown bear baiting over black bear bait stations with similar regulatory requirements as stated in 5 AAC 92.044, bait stations for black bear in Unit 13 or subunit 13D with season dates from April 15 to May 31, closed by emergency order by Department of Alaska Fish & Game. Non-resident baiters would have to have a registered guide-outfitter to harvest bears with bait stations.

If one of these proposals is passed by the Board of Game it will alleviate brown and black bear populations and increase moose and caribou populations, depending upon what subunit of Unit 13 is considered by the Board of Game.

Brown bears in Unit 13 are not an endangered species, and are thought to be at a healthy population. Approving a regulation to have brown bear bait stations over black bear bait stations will allow hunters to bait brown bears that are seen or known to be near black bear bait stations. Brown bears will be caught in black bear bait stations and both populations will be reduced at the same time.

Once a brown bear has discovered food near a black bear bait station, it will not leave the area; it will continually stay in the area to eat bait food. A hunter will most likely have to abandon the area, so they will not be cited for incidentally harvesting a brown bear in a black bear bait station, because there isn't a current bait station regulation for brown bears.

There aren't enough hunters harvesting brown or black bears in Unit 13 or subunit 13D. Brown bears feed upon calves of moose. Harvesting brown and black bears under hunting regulations and utilizing bait stations in Unit 13 will help to reduce brown and black bears. There appears to be too many brown and black bears in Unit 13, baiting brown bears should be done to reduce population of bears.

Small Bull Moose will increase in a few subunits of 13, if these proposals were passed by the Alaska Board of Game. Community Subsistence Harvest Hunt program for moose bag limit has been reduced from 100 to 70 because of conservation concern in subunit 13A, 13B, 13C and 13D. Bait stations in Unit 13 will grow moose population and built up the small Bull Moose population.

Comments on Proposal 79 We oppose Proposal 79. A resident tag fee exemption for taking brown bear on National Preserve Lands should continue to be held in place. There are too many brown bears preying and killing calves of moose and caribou in Unit 11 and

Unit 12. There isn't a conservation concern for brown bears. Brown bear population is thought to be healthy and is not an endangered species.

With the current regulations in place, hunters can opportunistically, hunt and take a brown bear while out hunting for moose or bison. The tag fee exemption for brown bears provides hunters more opportunities to hunt for other species and brown bear at the same time, which provides for their families.

Brown bear hides can be made into handicrafts and sold. Brown bear handicrafts provide much needed income for those who hunt brown bear to sell hides to supplement incomes. If this regulation is passed by the Board of Game, they will have to pay twenty-five dollars tag fee. Some hunters can't afford to pay for a hunting license and tag fees for brown bears and will stop hunting opportunistically.

If a tag fee is required to harvest brown bear on National Preserve Lands, it will hinder some hunters from choosing to hunt brown bears. They will not want to pay the \$25 tag fee and pay for a hunting license as well. They also may have to pay for a Guide to take them out brown bear hunting, which will be an added cost to their hunting for brown bears.

Comments on Proposal 80 We oppose Proposal 80. See comments after proposal 81 for population and harvest objectives that we support.

Comments on Proposal 81 We support Proposal 81. Adjusting moose population objective range and harvest objective range in subunits of 13 makes the range of numbers more realistic. According the ADF&G, current harvest for Bull Moose in 13A in 2011 the harvest was 293, in 13B it was 266, in 13C it was 113, in 13D it was 83, in 13C it was 180. As it is proposed in this proposal, these current harvests for Bull Moose harvested in 2011 are within the harvest objective range.

Previous range of moose numbers and harvest range of numbers were mostly likely based upon a percentage estimate. The moose population objective range and harvest objective range of numbers do not seem to be based upon a calculated range of numbers that are attainable. These ranges were probably done in the early 80s and are not applicable or attainable.

Wolf Control Program in some units of Unit 13 has been successful and the moose population has been built up again. It is time now to change the wolf control program. Moose population has increased in Unit 13 and wolf control program should be slowed or stopped in some areas. Carrying capacity of moose may be affected by increased moose population.

Comments on Proposal 82 We do not support Proposal 82. See our comments on proposal 83 for changes to the wolf population objectives that we support.

Proposal 83 by Copper Basin Fish and Game Advisory Committee

Modify the intensive management plan for Unit 13 as follows:

Comments on Proposal 83 We support Proposal 83 with an amendment to keep the authority of the department to continue to manage the wolf control program in Unit 13 and to delete (c) in 5 AAC 92. 125. The department should have the discretion to make decisions to begin or suspend wolf control activities based upon moose population objective range and harvest objective and implementing a trigger to suspend the wolf control program when they determine it is best to do so. The department has managed the Wolf Program and it has been successful. Closure of hunting and trapping of wolves, when the wolf population is low should not be a part of IM Plan. Monitoring of the wolf control program by the department should ensure that over kill of wolves does not occur in Unit 13. If the wolf control program is managed and monitored properly, trappers and hunters should not have to stop harvesting wolves.

The public's view of keeping the wolf program in place as it is at this time, with an increased moose population in Unit 13 will be viewed negatively. It would be counterproductive to keep the wolf control program in place as it is with an increased moose population. The department implementing a trigger point to suspend wolf activities in Unit 13 will aide in doing this.

Moose population in Unit 13 has increased due to Intensive Management program. Liberal hunting seasons and opportunities for moose has occurred because of this program. IM Program needs to be reviewed with minor changes made to it.

Comments on Proposals 84 and 85 We support Proposals 84 and Proposal 85. Establishing a bear and wolf control program in portions of Unit 11 and Unit 12 will help the calves of moose and Mentasta caribou to survive to adulthood. Brown bears prey upon calves of caribou and wolves prey upon calves of moose in these units. The Mentasta Caribou herd is at its lowest population since the 80s. In 2012 the herd was down to 326. It has been mostly due to predation by predators. Hunting for caribou is not allowed in Unit 11. Humans are not the cause of the decline of Mentasta Caribou Herd decline or the moose population.

Ahtna's checker board land ownership is 6 sq. miles; airplanes can land on lakes within these areas of land. Land ownership or checker board pattern should not be a deterrent to establish a bear and wolf control program or one or the other portion of these two units.

If the Mentasta Caribou Herd is built up again with predator control programs in place, local federally qualified customary and traditional users will be able to hunt for caribou again in Unit 11. Unit 11 is closed to hunting caribou because of its low population, it is a conservation concern.

Moose population is at a low density population, and a severe winter with high snow fall could bring down the moose population in Unit 11 and Unit 12. Moose population may not stay sustainable in the future. A crash of the moose population could occur. A predator control program will help to ensure that the moose population remains stable.

Caribou and moose are a customary and traditional food source. Caribou and moose were hunted and harvested in the past before restrictions and regulations were in put into place. This area is an inaccessible place to travel to hunt in. It is difficult for local people to hunt in this area, air planes or boats are needed to get to this area to hunt.

Comments on Proposal 86 **We oppose Proposal 86.** Trappers will suffer if they are not allowed to take wolves to sell for their fur value. Trapping is a customary and traditional way of life which provides supplemental income to those who depend upon it. Trapping wild game to add to their income will be taken away from local trappers; they will suffer from this lack of income.

Tourist can travel to other areas in Alaska to view wolves or other wild game. Spreading wealth to other communities will help those communities economically. Planned trips by tourist can be done through the guiding services in Alaska.

No wolves were sealed in 2011. Trappers haven't reported taken wolves within this area. There isn't a concern of over harvest of wolves in this area. Regulation should not be changed to close taking of wolves.

Comments on Proposal 87 No comments on Proposal 87. Alaska Board of Game does not have authority to allow off-road-vehicles in Denali State Park – (11 AAC 12.020.). Denali State Park has management authority over its lands.

Comments on Proposal 88 **We support Proposal 88.** The current season in Unit 13B is August 10 – November 30, 10 per day and 20 in possession. A longer hunting season combined with reduced bag limit and 10 in possession would provide an opportunity to harvest ptarmigan in Unit 13B. Limiting the bag limit and increasing the later season will make adjustments so that Ptarmigan is not over harvested.

A later season during the winter and warmer months of March provides a good opportunity to harvest a ptarmigan. Supplementing food sources when other wild game provisions are low would be good for customary and traditional users. Caribou season is open until March 31 too, so a combined opportunity will exist to harvest both species in one hunting excursion.

The Department can close Ptarmigan hunt if too many Rock Ptarmigan are harvested and keep Willow Ptarmigan season and bag limit open.

Comments on Proposal 114 **We conditionally support Proposal 114.** Nonresidents seasons should only be allowed when subsistence uses and Non-subsistence resident needs are fully satisfied. When Non-resident season are appropriate, opening resident hunting season seven days before nonresidents in Region IV in regards to the Unit 13 moose regulations will provide more opportunities for customary and traditional users a chance to hunt with less hunters in the field, competing in Unit 13 to harvest a moose.

Harvesting a moose for local customary and traditional users in Unit 13 is not a planned, costly, guided Sport Hunt; moose provides meat for the communities in our area. Every opportunity to reduce the competition in Unit 13 should be evaluated and acted upon by the Board in regards to Unit 13 customary and traditional use moose hunting season. Does a non-resident hunt comply with 2006 and 2011 BOG Findings? All hunts in Unit 13 should be evaluated from those findings.

Seven days may only be one week, but it still will make a difference to local C&T users who hunt moose in Unit 13. Fewer hunters in the field will only benefit hunters in Unit 13. Competition will be reduced by fewer hunters in the field.

Comments on Proposal 119 We support Proposal 119. Opening a year around coyote season without a bag limit will not be detrimental to the population of coyotes in Unit 11 and Unit 13. There isn't biological concern for coyotes in Region IV.

More small game will survive if a year around season without bag limit for coyotes were established in Unit 11 and Unit 13. Hares will survive if a hunting season is passed to liberalize bag list and hunting season for coyotes.

Hunters will have more opportunity to harvest coyotes. They could make clothing out of furs or sell it. Economic opportunity will be gained by hunters in Unit 11 and Unit 13 if this proposal passed.

Comments on Proposal 120 We oppose Proposal 120. Proposal 120 would change the season dates in Region IV from August 10 – May 30 to August 10 - April 30 and harvest of no limit to 10 coyotes per day on National Preserve Lands. Shortening the Unit 11 and Unit 12 wolf and coyote season between May 1 and August will allow wolves to prey upon moose calves and caribou calves and kill them. Moose and caribou are vital to Ahtna; these two large wild games are two of our customary and traditional use food sources. It is imperative that the season dates and bag limits be kept in place on National Preserve Lands to protect calves of moose and caribou.

Comments on Proposal 121 We oppose Proposal 121. There isn't a conservation concern in Unit 11, Unit 12 and Unit 16 for wolves on WRST and Denali National Preserve Lands. Shortening the hunting season for wolves on National Preserve Lands will allow them to kill calves of moose and caribou. A lengthy hunting season will aide in reducing wolves in these units. Wolves prey upon other smaller vertebrates and reducing their population will increase these small species.

Intensive Management Program will be affected in Region IV. Intensive Management program will be hindered and be ineffective in reducing the wolf population so that the moose population will grow. Moose and caribou is customary and traditional use species within these units. Local C&T users will suffer if this proposal is passed by the Board of Game.

Wolves are primarily taken for their pelts for clothing or to sell for profit. Hunters and trappers will not be able to practice their way of life. Trapping which is customary and traditional use will be closed to trappers in Unit 11 and Unit 13, if proposal is passed by the Board of Game.

Comments on Proposal 122 and Proposal 124 We support Proposal 122 and Proposal 124. A resident tag would not be required for taking brown bear in Unit 11, Unit 12, Unit 13, and Unit 16(a) outside of Denali Park and Unit 20 will allow hunters to take a brown bear without being required to pay \$25 tag fee.

Brown bear populations are thought to be healthy. Brown bears prey upon calves of moose. Killing more brown bears without the added regulation to pay a \$25 tag fee will encourage more hunters to harvest a brown bear every year.

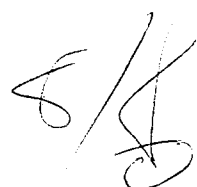
Anything that can be done through regulatory action by the Alaska Board of Game to reduce Brown Bears in Region IV should be sought and implemented by the Board. A \$25 tag fee will discourage hunters from hunting brown bears/grizzlies. A hunter will not be able to shoot a brown bear if he/she spots one while out hunting for other large wild game.

Requiring a \$25 tag fee along with a hunting license will discourage hunters from hunting brown bears in Region IV. A hunting trip can be expensive, if hunters have to travel far distances to take a brown bear, a tag fee will be another expense for them.

Comments on Proposal 123

See comments under Proposal 62, Proposal 63, Proposal 64, Proposal 70, Proposal 71.

Comments on Proposal 126 We support Proposal 126. Prohibiting the aid or use of domestic goats and sheep as pack animals while hunting for sheep or goat will prevent disease from spreading to wild game in Alaska. Introduced disease could spread to other game. It also is difficult for sheep to recover once pneumonia is introduced to sheep population, die off occurs. Feces or urine from domestic goats and sheep will introduce disease to wild game.

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