
ALASKA BOARD OF GAME

Special Meeting

Web-Conference | March 18, 2021

Annual Reauthorization Proposals for All Units • Sealing Requirements for Wolves Taken in Unit 2 • Align Seasons and Bag Limits for Moose in Unit 15B

On-Time Public Comment Index

Comments on Proposals

Ahtna, Incorporated..... PC01

Alaska Wildlife Alliance PC02

Bennett, Joel PC03

Chugach State Park Citizens Advisory Board PC04

Cole, Jeanie PC05

Jones, Somerset PC06

KAWEREK, INC..... PC07

Knapp, Michael PC08

Office of Subsistence Management (OSM,FWS) PC09

Point Mackenzie Community Council..... PC10

Thompson, Gary..... PC11

Comments on Scheduling, Call for Proposals

Bloom, Arthur PC12

Bloomquist, Aaron PC13

Klutsch, Joe PC14

Matanuska-Susitna Borough Fish and Wildlife Commission PC15

Resident Hunters of Alaska (RHAK) PC16

ALASKA BOARD OF GAME

Special Meeting

Web-Conference | March 18, 2021

Annual Reauthorization Proposals for All Units • Sealing Requirements for Wolves Taken in Unit 2 • Align Seasons and Bag Limits for Moose in Unit 15B

On-Time Public Comment Index

Request for Support of Legislation Regarding Transfer of Permits for Deceased Hunters

Baldrige, Monica	PC17
Bonfield, Savannah.....	PC18
Bowerson, Rodney	PC19
Bowerson, Whey	PC20
Campoamor, Danielle	PC21
Campoamor, Teresa.....	PC22
Chikigak-Steadman, Tye.....	PC23
Colbry, Sierra.....	PC24
Clouser, Justin	PC25
Corbett, Bryson	PC26
Duwe, Erik.....	PC27
Fekete, Christine	PC28
Fekete, Maxine.....	PC29
Gibbs, Arielle.....	PC30
Goldstein, Michelle	PC31
Harp, Lonny.....	PC32
Harwood, Leigh	PC33
Hillborn, Sonny.....	PC34
Holbrook, Teresa.....	PC35
Inama, Geri	PC36

ALASKA BOARD OF GAME

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Annual Reauthorization Proposals for All Units • Sealing Requirements for Wolves Taken in Unit 2 • Align Seasons and Bag Limits for Moose in Unit 15B

On-Time Public Comment Index

Jones, Mary PC37

Kopiasz, Phyllis PC38

Koskela, Ashley PC39

Lesh, Jennifer PC40

Lindquist, Cord PC41

McGillivray, Scott PC42

McGillivray_Sharon PC43

McGillivray, Thomas..... PC44

Neithercoat, Brennen..... PC45

Nelson, Debra PC46

Phillips, Alyssia PC47

Pleas, Aud PC48

Salter, Joyce PC49

Schmitz, Ashley PC50

Schrank, Ryane..... PC51

Schwaderer, Leslie PC52

Smith, Melody..... PC53

Trent, Aaron..... PC54

Trent, Jeff & Kelly PC55

Vanvliet, Christine PC56

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PC01
1 of 4

Our Culture Unites us; Our Land Sustains us; Our People are Prosperous

March 5, 2021

ADF&G Support Section
ATTN: Board of Game Comments
P.O. Box 115526
Juneau, Alaska 99811-5526

To members of the Alaska Board of Game:

Ahtna, Incorporated ("Ahtna") is hereby submitting written comments on Statewide Proposal 6 – Brown Bear Tag Fee Exemption, Proposal 58 – Re-Authorization of Antlerless Moose Hunt in GMU 13, and Proposal 183 – Re-Authorization of Antlerless Moose Hunt in GMU 20A.

Proposal 6

Ahtna supports Proposal 6 to reauthorize the brown bear tag fee exemptions in GMU 11 and GMU 13. Brown bears are in abundance, and there is not a conservation concern.

Brown bears prey upon calves of moose and caribou. Hunters should be allowed to hunt brown bears without having to pay a \$25 brown bear tag fee. Based upon ADF&G brown bear population studies within GMU 13A (Brockman *et. al.* 2020. *Effect of Harvest on a Brown Bear Population in Alaska*), there appears to be no ADF&G resource concern regarding the low abundance of brown bears. Ahtna's own non-invasive hair snaring efforts in partnership with ADF&G have found that there is a healthy brown bear population within GMU 13.

Based on past abundance studies, ADF&G estimated that Ahtna would find one brown bear in our first year (2018) of sampling our study area (30 mi²). That estimate was inaccurate; Ahtna found 22 individual brown bears in the study area using DNA from hair samples. This suggests a higher population abundance than originally estimated. ADF&G's goal of reducing brown bear abundance by 50% to help with moose calf survival has not been met to our knowledge.

The tag fee exemption will enable the incidental harvest of brown bears while in pursuit of ungulates in GMU 13, where there is currently a resource concern regarding moose. Incidental harvests of brown bears are a key tool in the population management and conservation in GMU 13 and GMU 11. Removing the tag fee will help with the harvest of brown bears.



Proposal 58

Ahtna does not support Proposal 58 to allow antlerless moose permit hunting in GMU 13A.

Proposal 58 would authorize a general hunt open to all Alaska residents for one antlerless moose in GMU 13A. Up to 200 permits would be issued by ADF&G through a draw. The season would be 10/1-10/31 and 3/1-3/31.

This hunt is not necessary. Cow moose may be impregnated and incidentally killed or wounded by hunters. We do not consider moose to be over-populated in GMU 13A. Moose population shouldn't be managed by human intervention. If moose do not have forage, they will move to other areas to feed themselves.

Currently GMU 13A is part of 5 AAC 92.121: Intensive Management Plan V. The goal of the Intensive Management Plan is to increase moose numbers through the means of predator control. This may be implemented when there is a resource concern regarding a low moose population in GMU 13A. We do not believe that the authorization of an antlerless moose hunt is the best management strategy for regulating the moose population in GMU 13A when there is a resource concern.

The stated concern is that moose in GMU 13A are reaching carrying capacity and becoming nutritionally stressed. Based on publicly available ADF&G data, there appears to be little vegetation work done in GMU 13A to understand how many moose the landscape can carry. The lack of habitat information, mixed with inconsistent aerial surveys due to snow conditions or budget constraints, leads us to believe that the current carrying capacity is an estimate based on older data. Further research should be done regarding vegetation/habitat and moose populations before an antlerless hunt is reauthorized.

In addition, allowing hunters to harvest antlerless moose during the gestation period may have a larger effect on the moose population than anticipated when other mortality factors, such as predation and winter kill, can vary year to year. We have seen this with the Nelchina caribou herd. Harvesting more caribou and encouraging shooting cows when there was believed to be an abundance, coupled with unforeseen factors such as predation and a harsh winter, caused the population to decline to an unfavorable level and restricted hunting activity the following season. We understand that if the moose population reaches carrying capacity it can lead to nutritional stress, population die-out and reduced antler growth. However, reducing the moose population would lead to more forage availability which could result in more antler growth and more harvestable bull moose from the existing population.

Further, not all moose will increase antler growth when forage is increased. Some bulls simply do not have the genetic structure to produce larger antlers; thus a population reduction is not a



ADF&G Support Section
ATTN: Board of Game Comments
March 5, 2021
Page 3

guarantee for larger bulls. A population reduction in the form of harvesting cows will lead to a population decline that will lead to fewer moose on the landscape. This will lead to fewer harvestable bull moose in the long term. If the concern is nutritional stress, this Board should allow the natural process such as predation to control the population.

There are other alternatives to reduce the moose population to meet the carrying capacity needs. This may include restructuring the antler requirements or issuing more community harvest moose tags. We believe this would satisfy the hunter harvest issue as well as the (speculated) over-abundance issue.

Another concept that should be addressed to help the population instead of an antlerless hunt is to implement improvement projects to create more habitat to support a larger healthy moose population. This will increase the hunter harvest to reach your harvest objectives. If the antlerless hunt is intended to help meet harvest objectives, it is less a resource concern and more of a hunter success concern, which should be addressed in a different manner.

We are concerned that what is happening in GMU 20B will occur in GMU 13A. In GMU 20B, an antlerless moose hunt is allowed. Hunters from Fairbanks and other communities hunt for moose in GMU 20B. They have depleted the moose population close to Minto Village and moose that could have been harvested in accessible areas along highways. There is already great difficulty in harvesting moose for a funerary potlach. The Minto Village tribal members are directly impacted by the antlerless moose hunts in their areas.

Further, an antlerless moose hunt encourages hunters to take advantage and create crowded hunting conditions. This directly impacts tribal members who are not harvesting moose due to crowding and over-hunting of antlerless moose by other hunters.

Ahtna firmly opposes authorizing this antlerless hunt as stated above. However, if the Board does authorize this hunt, it must be a subsistence hunt, not a general hunt, and the priority must apply. There is currently no subsistence moose hunting opportunity in GMU 13(A) in October and March under State regulations. Also, there is no antlerless moose subsistence hunt provided for Unit 13(A) under State regulations. The needs of Ahtna subsistence hunters for moose are not being met by current subsistence hunts. Only after subsistence needs have been met can there be a general drawing hunt.

Ultimately, any additional subsistence moose opportunity should be directed to the Community Subsistence Hunt (CSH). The Board of Game findings for C&T use of moose in GMU 13 support directing any additional subsistence moose hunting opportunity to the CSH. There are restrictions for those in the CSH that clearly demonstrate that any additional moose hunting opportunity should be directed to the CSH. CSH permit restrictions dictate: "No member of the (CSH) household can hold any state drawing/Tier I/Tier II/registration moose

ADF&G Support Section
ATTN: Board of Game Comments
March 5, 2021
Page 4



PC01
4 of 4

hunts, hold general season moose harvest tickets, or hold federal moose permits outside of the CSH hunt area." Pursuant to these restrictions, a CSH household would not even be eligible to apply for the proposed antlerless draw hunt.

If the Board authorizes the antlerless hunt through the CSH or otherwise, it would also need to require a Tier II permit process for the hunt since the amount of allowable harvest of antlerless moose would exceed subsistence needs.

Proposal 183

Ahtna also opposes Proposal 183 to allow an antlerless moose hunt in GMU 20A and the remainder of GMU 20A, in the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area.

We oppose an antlerless moose hunt in GMU 20A, which could result in killing of cow moose that are either impregnated or have a calf nearby. Killing an impregnated cow would equate to taking a cow and a calf. Allowing the hunting of antlerless moose would also likely result in an increase in the orphaned calf population.

In summary, the moose population should not be managed by human intervention. Moose will move to other areas to find food sources. Humans should be managed, not moose. Ahtna supports allowing a hunt of more bull moose rather than cows.

Please consider our comments during your deliberations.

Sincerely,

A handwritten signature in black ink, appearing to read "John Dye".

John Dye
Ahtna, Incorporated
Cultural and Traditional Committee Chair



Submitted By
Nicole Schmitt
Submitted On
3/5/2021 12:44:27 PM
Affiliation
Alaska Wildlife Alliance

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Alaska Wildlife Alliance comment on Proposal 194

On behalf of our Alaska-based membership, Alaska Wildlife Alliance thanks the Board for the opportunity to comment in support of Proposal 194. This proposal appears responsive to the shortcomings of the current regulatory regime in GMU 2.

We understand that the management regime for GMU 2 wolves, prior to the change precipitated by Proposal 43 in 2019, put ADF&G in a difficult situation. The department was tasked with maintaining a “sustainable” wolf population without clear population objectives. While the 2019 management shift provided ADF&G with clear wolf population goals, it removed the mechanism the department had to track wolf harvest during the season (in-season sealing), thereby removing its ability to accurately monitor wolf harvest until after an overharvest occurred. This was the case in the 2019-20 season, and led to unknown harvest rates in the shortened 2020-21 season until a month after the season ended. As ADF&G states in Proposal 194, “accurate population estimates are key to setting annual season length and maintaining the population within the objective range for this contentious population.” We believe that rapid, yet reasonable, harvest reporting is essential to accurately monitoring population levels during the trapping season.

Our primary concern is that the existing management regime for wolves in GMU 2, which relies exclusively on season length as the only mechanism for ensuring sustainable harvest, is inconsistent with constitutional requirements of sustained yield. We are pleased to endorse this proposal, with suggested amendments, as a remedy to the flawed regime currently in place.

Suggested amendments:

- Harvest report within 48 hours and sealing within 5 days (as adopted in GMU 1C)
- Traps must be lifted 24-48 hours after a season or emergency closure

While the proposed 7-day sealing period is far superior to the current 30-day sealing period, we continue to urge the Board to adopt a wolf management regime for GMU 2 similar to that of GMU 1C, Douglas Island. There, a trapper who takes a wolf in the management area must report the harvest to ADF&G Division of Wildlife Conservation in Douglas within 48 hours of taking the wolf and present the hide for sealing within 5 days.

Given that the Alexander Archipelago wolves in GMU 2 are currently undergoing an Endangered Species Act petition review, we encourage the Board to adopt the management regime already in place in GMU 1C for application in GMU 2 to ensure constitutionally provisioned sustained yield. We also urge the Board to amend the proposal to add language that traps must be lifted 24-48 hours after the closing of the season or an emergency closure. This is a prudent and efficient management tool that will ensure proper allowable harvest and avoid exceeding sustainable yield principles mandated by the Alaska Constitution.

While the focus of our involvement in this issue revolves around sustained yield of wolves, the local concern over deer populations must also be acknowledged. Many of Alaska Wildlife Alliance’s members, Board, and staff are hunters. We support Alaskans’ right to harvest of game and fill their freezers, especially those in rural communities such as on Prince of Wales. However, the public assumption that wolves are responsible for deer diminishment in GMU 2 must be candidly discussed and dealt with according to biological and legal requirements.

In the Board discussion of Proposal 43 in 2019, then Chairman Spraker asked Mr. Schumacher whether ADF&G shared the public’s view that deer populations in GMU 2 are declining because of wolves.

Mr. Schumacher responded:

*“The Fish and Wildlife Service went through their species status assessment for wolves, and they did some modeling and looked at long-term habitat condition and came up with, that the long term trend is that **Unit 2 will support fewer deer in the future, primarily due to forest management conditions.** What we’ve seen here are short term changes which seem more likely due to something else, **whether that’s wolves, whether we’ve had, in the last 7 or 8 years record deer harvests,** that could play some role in it. We can’t really speculate but it would be accurate to say that people on the island generally attribute it to the presence, or increased number, of wolves.” [5:34:04](#).*

Mr. Schumacher's response expressly and implicitly acknowledges the underlying tension here – scientific and legal requirements for wildlife management, and the pressures of local residents to harvest deer in large quantities, even as deer habitat has been diminished by timber harvest. The situation has unfortunately resulted in the scapegoating of wolves, where demand for their culling is inconsistent with constitutionally-mandated sustained yield purposes.

In an indirect manner, Proposal 194 addresses sustained yield provisions. From a practical perspective, the proposal gives ADF&G responsible mechanisms that will give the department necessary game management tools to stay in compliance with constitutional requirements. We hope the Board considers and adopts this proposal as a step in the right direction of creating an active and appropriate management regime for GMU 2 that ensures the sustainable harvest of wolves.

Thank you for your consideration in this matter.

Sincerely,

Nicole Schmitt,

Director, Alaska Wildlife Alliance

Alaska Wildlife Alliance was founded by Alaskans in 1978 to advocate for the ecosystem-based management of Alaska's wildlife.



Submitted By
Joel Bennett
Submitted On
3/5/2021 12:28:17 PM
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JOEL BENNETT COMMENT ON PROPOSAL 194

SUPPORT, with amendment, to add a 48-hour reporting requirement and possible reduction in sealing time.

With ADFG's goal of achieving a wolf harvest that falls with the population objective established by the Board of Game, a wolf harvest reporting requirement of 48 hours is a reasonable additional measure to add to ADFG's proposed shorter sealing time requirement. This reporting requirement has precedent in current regulation in GMU 1-C, in the case of another isolated island wolf population.

The 7- day sealing requirement as recommended by ADFG may be reasonable IF a 48-hour reporting requirement after taking a wolf is implemented. If no reporting requirement is added to the proposal by amendment, I would urge the Board to amend the proposal by adopting a shorter sealing requirement. Out of an abundance of caution regarding the risk of overharvest, a 3-day sealing requirement seems prudent, unless there are compelling reasons to make it longer.

As a long-term resident resource user, I appreciate your consideration to adopt measures to assure wolf sustainability in GMU 2.



CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

18620 Seward Hwy, Anchorage, AK 99516 Phone: 907-345-5014 Fax: 907-345-6982

January 12, 2021

ADF&G Boards Support Section
Attn: Board of Game Comments
P.O. Box 115526
Juneau, Alaska 99811-5526

Subject: 2020/2021 Board of Game Proposal 178 (GMU 14C)

I am writing on behalf of the Chugach State Park Citizens Advisory Board regarding a regulatory proposal that will affect Chugach State Park. Please consider these comments during the upcoming Board of Game meeting.

The Chugach State Park Citizens Advisory Board assists park staff in an advisory role with park management and development issues. As an advisory board, our decisions are guided by the five primary purposes established in creating the park:

- 1) To protect and supply a satisfactory water supply for the use of the people;
- 2) To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas;
- 3) To protect areas of unique and exceptional scenic value;
- 4) To provide areas for the public display of local wildlife; and
- 5) To protect the existing wilderness characteristics of the easterly interior area.

The 15-member advisory board is comprised of park users representing various interests ranging from backcountry skiers, hikers, hunters, bikers, mountain climbers, as well as, ATV and snowmachine users. At approximately 495,000 acres, Chugach State Park comprises nearly half of the Alaska Game Management Unit (GMU) 14C. With over 1.3 million visitors to the park annually, we have an interest in Board of Game regulation changes that may affect park resources and visitors.

We have carefully reviewed the 2020/2021 Board of Game regulatory proposal that will affect the park's wildlife and users. Our recommendation and any proposed amendments are included below. This proposal was discussed and voted upon during our January 11, 2021 meeting. 13 members of the board were present, with 2 members being excused.

PROPOSAL 178 REAUTHORIZE THE ANTLERLESS MOOSE SEASONS IN UNIT 14C AS PROPOSED BY THE ALASKA DEPARTMENT OF FISH AND GAME.

Amendment(s) Discussed: None

Recommendation: Approval (13-Yea, 0-Nay)

Findings: This hunt has proven to be an effective tool at managing the moose population within GMU 14C for several years. This proposal comes



directly from the state's authority on wildlife management, the Alaska Department of Fish and Game. Requiring annual renewal of this hunt allows the Department of Fish and Game to closely regulate antlerless moose harvest quotas to keep the moose population within a sustainable number. Keeping the moose population at or near the goal of between 1,500-1,800 moose within GMU 14C helps to avoid over-browsing of winter habitat and the resulting die-offs from starvation.

We greatly appreciate the opportunity to review and submit comments on this proposal. Please let me know if you have any questions regarding this recommendation. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Yelle".

Ryan Yelle
Chair

cc: Haley Johnston, Acting Vice Chair
Ben Corwin, Acting Superintendent, Chugach State Park
Dave Battle, Wildlife Biologist, ADF&G



Submitted By
Jeanie Cole
Submitted On
3/4/2021 1:55:31 PM
Affiliation

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Please support Notice proposal 194, which would create a 7 day sealing period on wolves in Prince of Wales. This would be a step in the right direction of tracking the wolf kill, so the Department could at least issue an Emergency Order to halt the season if needed. It would also allow the Department to estimate the wolf population more accurately in Unit 2, which is essential for setting annual harvest quotas. This shorter sealing requirement would help avoid overharvest which has occurred in this area in the past.



Submitted By
Somerset Jones

Submitted On
1/4/2021

Email
CID1893@mtaonline.net

Proposal 79

The antlerless permit hunts in 14A & B should be no longer allowed. Population studies have been done in Feb when other moose, not resident, winter at Point McKenzie and bulls are losing their antlers, causing inflated population results. During May thru Nov the resident population must bear all the antlerless permits. This is decimating the local Big Lake/ Point McKenzie population and should therefore be stopped.

If there are moose causing problems then they should be hunted via the nuisance moose hunt program and not the antlerless moose permit.

Somerset Jones

Chugiak, AK



KAWERAK, INC.



PC07
1 of 3

Tungwenuk Family Qupak Design, used with permission

January 3, 2021

REPRESENTING

Brevig Mission

Sitaisaq

Council

Akauchak

Diomede

Injaliq

Elim

Neviarcuarluaq

Gambell

Sivuqaq

Golovin

Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Iglaaruk

Nome Eskimo

Sitnasuami Inuit

Savoonga

Sivungaq

Shaktoolik

Saktuliq

Shishmaref

Kigiqtaq

Solomon

Anjuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tupqaqruk

Unalakleet

Uqalaaqtiq

Wales

Kinjigin

White Mountain

Natchigvik

ATTN:

**Alaska Department of Fish and Game
Boards Support Section
1255 W. 8th Street
Juneau, AK 99811-5526**

Kawerak, Inc. is the regional nonprofit tribal consortium for the Bering Strait/Norton Sound region. We provide services to sixteen communities including advocating for subsistence hunting and fishing. We offer the following comments for the ADF&G; Board of Game consideration.

Kawerak is in support of the following proposal.

Proposal 190 Reauthorize brown bear tag fee exemptions.

The majority of Game Management Unit (GMU) 22 bear harvest by local residents is opportunistic. Moose and caribou are harvested as the main food source. The brown bear population across GMU 22 has risen according to ADF&G's latest bear population survey. The brown bear tag exemption fee for GMU 22 should remain in place to help offer incentive to hunters as well as to help increase harvest opportunity to an ever increasing bear population.

Kawerak is opposed to the following proposal.

Proposal 129 5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Require the use of expanding (soft point) bullets for big game hunting, excluding wolf and wolverine.

Big game animals have been ethically and humanely put down with any of the various small caliber high velocity chamberings, with proper shot placement being the key to any hunting situation. Small caliber high velocity ammunition in full metal jacket (FMJ) such as a .223 Remington is more than capable of hitting the vitals of any big game animal. The kill zone on a bull moose is roughly eighteen (18") inches in diameter, bear and caribou slightly smaller. Yes, FMJ's do produce a narrow wound channel compared to expanding type ammunition, however, as long as the shot placement is in the vitals the animal will be humanely and ethically put down.

KAWERAK, INC.

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Advancing the capacity of our people and tribes for the benefit of the region.



Documentation shows that all it takes to ethically put down any big game animal is no more than a one quarter inch (1/4") hole in the vital organs, which the .223 Remington in FMJ is more than capable of performing.

Documentation on small caliber high velocity ammunition, such as the .223 Remington in FMJ, shows that after entry into the target the bullet will often tumble or summersault thus increasing the wound channel (in some cases as much as 3/4"). The majority of rural Alaskan hunters prefer not to waste any meat (due to the high cost of store bought meat). The documentation on expanding bullets clearly shows that the use of this type of ammunition does in fact waste more meat. This is a major factor for rural Alaskan hunters when choosing what type of ammunition to use/purchase.

The proposer states there will be a slight increase in cost due to the change of bullet design. To the contrary, rural Alaskan hunters would have to switch to an entirely different higher caliber rifle in order to go hunting. In many rural communities, small caliber high velocity rifles are passed-down from either the grandfather or the father. New bigger caliber rifles would have to be purchased, and these rifles are substantially higher in cost than a smaller caliber rifle which most rural Alaskan hunters simply cannot afford. A .223 Remington in an expanding type bullet simply does not have enough weight behind the bullet to have any kind of penetration or complete pass through on any big game animal. The cost of living is very high in rural Alaska, however, small caliber high velocity ammunition is more affordable. On the opposite end, larger caliber ammunition in rural Alaska is very expensive.

This proposal as written raises a question of whether it is a simple proposal requesting a bullet change from FMJ to expanding bullets or is the proposal inadvertently requesting to restrict hunting calibers. If this proposal passes, it will inadvertently restrict big game hunting to the larger calibers as no one would use expanding bullets in the smaller high velocity calibers.

Over the years, the Board of Game has deliberated on caliber restriction numerous times and the decisions regarding proposals to limit big game hunting to the larger calibers have always failed. Bigger caliber rifles do not equate to humanely putting down any big game animal. Individual hunters can and do miss the vitals even with the bigger caliber rifles, hitting animals in other parts of the body except where they were intended.

KAWERAK, INC.

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If you have any questions please feel free to contact VP of Natural Resources; Brandon Ahmasuk @ 907-443-4265 wk. or 907-434-2951 cell, or bahmasuk@kawerak.org. We thank you for your time and consideration.

Sincerely,

KAWERAK, INC.

M. Bahnke

Melanie Bahnke,

President

KAWERAK, INC.

PO Box 948 • Nome Alaska 99762 • 907.443.5231 • www.kawerak.org

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Submitted By
michael r knapp
Submitted On
12/27/2020 4:36:02 PM
Affiliation

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I am opposed to Proposal 99, the closed areas within Units 14A, 14B, and 16A to trapping. This issue was already addressed at the Borough level and rejected. It doesn't exclude trails that receive public funding that are in the middle of nowhere. Example would be: Petersville and Willow Mountain. Every trail in the Borough's trail plan including those away from civilizations like the Mail Trail is designated as a multi use trail to include skiing and hiking. Every trail in the Borough's plan is and can be considered developed hiking trail. I am also very concerned with using broad definitions of any public funding as that can lead to an imbalance in opportunity and imbalance in power to impose restrictions on the trapping community if any money goes to a trail. This proposal also eliminates a property owners ability to trap on their own land. This proposal leaves no exception to traps set in the trees, below the water, or below the ice which poses no harm to any domesticated animal or person. I am also opposed to #6 - closing Palmer Hay Flats State Game Refuge. This area is so expansive, there is no rationale to close it off entirely to trapping. However, there is a danger of eliminating a family activity that has spurred generations of young people to become engaged in outdoor life by learning how to trap Muskrats in this favored area. Regarding the add on item #10, - there is no rationale to this either. There is no conflict with the camping season and the trapping season as they do not overlap. Most State and Federal campgrounds are closed in the winter when trapping season is happening. This would effectively close all beaver trapping in all of Nancy Lakes State Recreation Area. The Alaska State Parks do not care if you trap beaver under the ice next to a trail or by someones camp or permanent dwelling because they understand it poses no danger. Again, as previously stated, this proposal and several like it, have been soundly rejected at the Borough level, so it is my final opinion that it should be laid to rest and not brought up again.



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503



In Reply Refer to:
FWS/IR11/20140

DEC 11 2020

Mr. Stosh Hoffman, Chairman
Attention: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

The Alaska Board of Game (Board) is scheduled to meet at to be determined dates to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Central and Southwest Region. We have reviewed the 100 proposals the Board will be considering at this meeting.

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

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-317-2165-or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Sue Detwiler
Assistant Regional Director
Office of Subsistence Management

Enclosure



cc: Anthony Christianson, Chair, Federal Subsistence Board
Deputy Assistant Regional Director, Office of Subsistence Management
Policy Coordinator, Office of Subsistence Management
State Subsistence Liaison, Office of Subsistence Management
Wildlife Division Supervisor, Office of Subsistence Management
Regional Advisory Council Coordinators, Office of Subsistence Management
Chair, Southcentral Alaska Subsistence Regional Advisory Council
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council
Chair, Bristol Bay Subsistence Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Central and Southwest Region

January 22-29, 2021

Wasilla, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 1 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Shift to later moose hunting seasons in Units 13 and 14.

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

Unit 14—Moose

No Federal open season

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

Impact to Federal subsistence users/wildlife: Adoption of this proposal would increase hunting opportunity for Federally qualified subsistence users, and could facilitate meat care by allowing harvest when temperatures are cooler. While the Unit 13 unit-wide moose population has been within State management objectives since 2008, Unit 13B’s population has been below subunit management objectives since 2013. Similarly, the unit-wide bull:cow ratio has been above State management objectives since 2004, while ratios have periodically dropped below objectives in subunits 13A, 13C, and 13E. Unit 13D has had consistently higher bull:cow ratios than the other subunits, averaging 75 bulls:100 cows from 2013-2019. The lowest bull:cow ratios have been observed in the most accessible portions of each subunit (ADF&G 2020a). Unit 13 experiences extremely high harvest pressure, with over 4,000 moose hunters in 2019; less than 9% of these hunters hunted in Unit 13D (ADF&G 2020b). Extending the moose season into October could disrupt breeding moose, depressing the moose population and bull:cow ratios.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 1 **with modification** to extend the season in Unit 13D only. (OSM is only commenting on Unit 13, not Unit 14).

Rationale: Extending the season in Unit 13D would provide more opportunity for Federally qualified subsistence users. There are no conservation concerns in Unit 13D due to a historically high bull:cow



ratio and a moose population within State management objectives. Additionally, harvest pressure is relatively low in Unit 13D.

High harvest pressure combined with bull:cow ratios and populations below State management objectives do not recommend a season extension in the remaining Unit 13 subunits. Additionally, extending the season further into the rut could disrupt breeding, further depressing bull:cow ratios and populations in these areas.

Literature Cited

ADF&G. 2020a. Annual report to the Alaska Board of Game on intensive management for moose with wolf predation control in Unit 13. February 2020. ADF&G, Division of Wildlife Conservation.
<http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.unit13#anchor>. Accessed April 29, 2020.

ADF&G. 2020b. Harvest General Reports database.
<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed October 1, 2020.
Anchorage, AK.

PROPOSAL 6 – 5 AAC 92.015. Brown bear tag fee exemptions. Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

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

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.

PROPOSAL 8 – 5 AAC 84.270. Furbearer trapping. Shorten coyote trapping season in Units 9, 13, 14B, 16 and 17.



Current Federal Regulations:

Units 9, 13, 16, 17—Coyote (Trapping)

No limit

Nov. 10–Mar. 31

Unit 14B—Coyote (Trapping)

No Federal open season

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunity for Federally qualified subsistence users trapping under State regulations and would likely have little impact on the coyote population. The wolf State trapping seasons in these units extend until April 30 or June 30. In Units 13 and 16, the wolf State trapping season opens October 15, while in Unit 9, it opens August 10. Therefore, shortening the coyote season may result in increased incidental take in these units when the wolf season is open, but the coyote season is closed.

Adoption of this proposal would result in alignment of closing dates between Federal and State regulations, decreasing regulatory complexity and user confusion.

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

Rationale: Adopting this proposal decreases opportunity for Federally qualified subsistence users, and no conservation concerns exist for coyote in any of these units. Additionally, shortening the coyote season could result in increased incidental take in these units when the wolf season is still open.

PROPOSAL 12 – 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-Sep. 20.

Unit 17A—up to 2 moose; one antlered bull by State registration permit, one 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.

Impact to Federal subsistence users/wildlife: Adopting this proposal increases 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, and the Unit 17A moose population is growing and can support the additional harvest.

As a fall antlerless moose season does not exist in Federal regulations, a similar proposal would need to be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021 in order to align State and Federal moose regulations in Unit 17A and reduce regulatory complexity and user confusion.

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 increase.

PROPOSAL 14 – 5AAC 85.045(15). Hunting seasons and bag limits for moose.

Establish fixed-season dates for resident registration moose hunts RM575 & RM576 in Unit 17A.

Current Federal Regulations:

Unit 17A—Moose

Unit 17A—1 bull by State registration permit

Aug. 25-Sep. 20.

Unit 17A—up to 2 moose; one antlered bull by State registration permit, one 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.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide more opportunity and flexibility for Federally qualified subsistence users by providing a longer and predictable season. The Unit 17A moose population is currently above management objectives and can withstand additional harvest. These hunts are also managed by harvest quotas, which assures sustainable harvests.



While Federal subsistence winter moose seasons in Unit 17A require State registration permits, adopting this proposal would result in misalignment of season dates, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: No conservation concerns exist as the moose population is currently above State objectives and additional harvest could help prevent habitat degradation. This proposal also increases opportunity and the ability to plan for winter hunts for Federally qualified subsistence users.

PROPOSAL 18 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

Extend the resident winter moose season in Units 17B and 17C.

Current Federal Regulations:

Unit 17—Moose

Units 17B and 17C—one bull

*Aug. 20-Sep. 15.
Dec. 1-31.*

During the period Aug. 20-Sep. 15—one bull by State registration permit; or

During the period Sep. 1-15—one bull with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side with a State harvest ticket; or

During the period Dec. 1-31—one antlered bull by State registration permit

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users by providing a longer season and better access to hunting areas when ice and snow conditions are safer. While bull:cow ratios and recent moose population estimates for Units 17B and 17C are not readily available, minimal impact to the population is expected if this proposal is adopted due to low harvest pressure during the winter season. Between 2012 and 2019, an average of 28 moose were reported harvested during the RM585 winter season, compared to an average of 159 moose reported harvested during the RM583 fall season (ADF&G 2020).

While the Federal subsistence December moose season in Units 17B and 17C require the State RM585 registration permit, adopting this proposal would result in misalignment of season dates, increasing



regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 18 **with modification** to also extend the winter moose season in Unit 17B, the portions extending 2 miles on either side of, and including, the following rivers: Nushagak River, beginning at the southern boundary of Unit 17B and extending north to the Chichitnok River, and including Harris Creek, Klutuspak Creek, King Salmon River and the Chichitnok River; Mulchatna River upstream to the mouth of the Chilchitna; Nuyakuk River extending west up to the falls; Koktuli River up to the mouth of the Swan River; and Stuyahok River to the confluence of the North/South Forks.

Rationale: Harvest opportunity for Federally qualified subsistence users would increase and minimal impacts to the moose population are expected due to low harvest pressure. Applying the extended season to all of Unit 17B and the entire RM585 permit area further increases opportunity and simplifies regulations.

Literature Cited

ADF&G. 2020. Harvest General Reports database.

<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed October 2, 2020. Anchorage, AK.

PROPOSAL 19 – 5 AAC 92.108. Identified big game prey populations and objectives.

Establish new population and harvest objectives for the Mulchatna caribou herd in Units 9, 17, 18, and 19.

Current Federal Regulations: N/A.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would help ensure Mulchatna Caribou are available for future harvest by Federally qualified subsistence users. Revising population and harvest objectives, informed by habitat quality studies, will promote effective, sustainable management of this important subsistence resource.

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

Rationale: OSM is concerned about the health and conservation of the Mulchatna Caribou Herd and supports measures to ensure the herd's sustainability.

PROPOSAL 20 – 5 AAC 85.025 (3)(4)(12)(13)(14). Hunting seasons and bag limits for caribou. 5 AAC 92.062. Priority for subsistence hunting; Tier II permits. Establish Tier II subsistence hunting season and bag limit for the Mulchatna caribou herd (MCH).

Current Federal Regulations:



Unit 9–Caribou

Unit 9A—2 caribou by State registration permit Aug. 1 – Mar. 15.

Unit 9B—2 caribou by State registration permit Aug. 1 – Mar. 31.

Unit 9C, that portion within the Alagnak River drainage—2 caribou by State registration permit Aug. 1 – Mar. 15.

Unit 9C, that portion draining into the Naknek River from the north, and Graveyard Creek and Coffee Creek—2 caribou by State registration permit. Public lands are closed to the taking of caribou except by residents of Unit 9C and Egegik Aug. 1 – Mar. 15.

Unit 17–Caribou

Unit 17A-all drainages west of Right Hand Point—2 caribou by State registration permit Aug. 1 – Mar. 31.

Units 17B and 17C-that portion of 17C east of the Wood River and Wood River Lakes—2 caribou by State registration permit Aug. 1 – Mar. 31.

Unit 18–Caribou

Unit 18-that portion to the east and south of the Kuskokwim River—2 caribou by State registration permit Aug. 1 – Mar. 15.

Unit 18, remainder—2 caribou by State registration permit Aug. 1 – Mar. 15.

Unit 19–Caribou

Units 19A and 19B (excluding rural Alaska residents of Lime Village)—2 caribou by State registration permit Aug. 1 – Mar. 15.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The regulations listed above are the codified Federal regulations. The Federal Subsistence Board approved modified regulations for the Mulchatna Caribou Herd (MCH) for the 2020/21 and 2021/22 regulatory years via Wildlife Special Action WSA20-04. WSA20-04 delegated authority to the Togiak National Wildlife Refuge (NWR) manager to open/close seasons, announce harvest limits, and set sex restrictions. In July 2020, the Togiak NWR manager announced a fall 2020 season of Aug. 1-Sept. 20 with a harvest limit of one bull.

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunity for Federally qualified subsistence users by shortening seasons and decreasing harvest limits. However, opportunity has already been reduced under State and Federal regulations during the 2019/20 and 2020/21 regulatory years because of conservation concerns for the MCH. Adopting this proposal would help conserve the MCH, particularly by closing the season during the rut, which could promote calf production and herd growth.



Adoption of this proposal would also result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. Federal regulations currently require the State RC503 registration permit. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

Federal Position/Recommended Action: The OSM recommendation is to **support** the proposed season and harvest limit changes and is **neutral** on the hunt structure/Tier II permits.

Rationale: While this proposal would decrease opportunity for Federally qualified subsistence users, conservation measures and more conservative harvest regulations are needed for the MCH due to its recent, substantial population decline.

PROPOSAL 23 – 5 AAC 92.080(4)(B)(vii). Unlawful methods of taking game; exceptions.

Allow the use of snowmachine to position wolf or wolverine for harvest in Unit 17.

Current Federal Regulations:

§ ____ .26 Subsistence taking of wildlife

...

(b) 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.

(5) Using a motorized vehicle to drive, herd, or molest wildlife.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Federal Subsistence Board deferred Proposal WP20-26 at their April 2020 meeting, which requested using a snowmachine to position wolves and wolverines in Unit 17. The Federal Subsistence Board is evaluating if there is a more consistent, enforceable, and statewide approach that would ensure compliance with multi-agency regulations while allowing efficient take of subsistence resources.

PROPOSAL 24 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

5 AAC 92.220. Salvage of game meat, furs, and hides. Establish a season, daily and seasonal bag limit, and salvage requirement for Alaska hare in Unit 17.

Current Federal Regulations:



Unit 17—Hare (Snowshoe and Tundra)

No limit

July 1 – June 30.

§__.25(j)(2) *If you take wildlife for subsistence, you must salvage the following parts for human use:*

* * * *

(iv) The hide or meat of squirrels, hares, marmots, beaver, muskrats, or unclassified wildlife.

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

Impact to Federal subsistence users/wildlife: Shortening the hunting season and decreasing the harvest limit for Alaska hare would decrease harvest opportunity for Federally qualified subsistence users, although harvest is likely low. However, conservation concerns exist for Alaska Hare as current abundance appears low and below historic levels throughout its range (Merizon and Carroll 2019). Closing the season during the breeding season between April and June when hares congregate (Murray 2003) and may be most susceptible to harvest should help conserve this species. Requiring the salvage of the hide or meat is in-line with subsistence harvest principles of utilizing harvested resources.

Adoption of the season and harvest limit part of this proposal would also result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021. Adoption of the salvage requirement would align Federal and State regulations, decreasing regulatory complexity and user confusion.

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

Rationale: Conservation concerns exist for Alaska Hares throughout its range. Requiring salvage of the meat or hide aligns Federal and State regulations and is in accordance with subsistence harvest principles.

Literature Cited

Merizon, R.A. and C.J. Carroll. 2019. Status of grouse, ptarmigan, and hare in Alaska, 2017 and 2018. ADF&G. Juneau, AK.

Murray, D.L. 2003. Snowshoe hares and other hares. Pages 147 – 175 in G.A Feldhamer, B.C. Thompson and J.A. Chapman, eds. Wild mammals of North America: Biology Management and Conservation. The Johns Hopkins University Press. Baltimore, MD. 1216 pp.

PROPOSAL 30 – 5 AAC 84.270. Furbearer trapping. Shorten the wolf trapping season in Units 9 and 10.

Current Federal Regulations:



Units 9, 10—Wolf

No limit

Nov. 10 – Mar. 31

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

Impact to Federal subsistence users/wildlife: While shortening the season would decrease opportunity for Federally qualified subsistence users, it is unlikely many users target wolves in May and June during the denning season and when fur quality is deteriorating. Changing the closing date of the wolf trapping season in Units 9 and 10 to April 30 would also align (or come closer to aligning with) the closing date of the coyote trapping season in these units under State regulations, which could reduce incidental take issues. Adopting this proposal may also reduce secondary impacts of taking wolves with active dens.

Federal and State wolf trapping seasons are currently misaligned for these units and would continue to be misaligned if this proposal is adopted, contributing to regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: Take of wolves during the denning season in May and June is likely low and fur quality is deteriorating. Shortening the State wolf trapping season brings these regulations more closely in line with State coyote and Federal wolf trapping seasons, reducing incidental take issues and reducing regulatory complexity.

PROPOSAL 31 – 5 AAC 84.270. Furbearer trapping. 5 AAC 85.057. Hunting seasons and bag limits for wolverine. Close wolverine trapping and hunting in Unit 10.

Current Federal Regulations:

Unit 10—Wolverine (Hunting)

1 wolverine

Sep. 1 – Mar. 31

Unit 10—Wolverine (Trapping)

No limit

Nov. 10 – Feb. 28

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunity for Federally qualified subsistence users, although wolverine harvest in Unit 10 appears to be extremely low



to nonexistent. No conservation concerns exist for wolverine in Unit 10 due to the lack of harvest, and ADF&G questions whether wolverines still occur on Unimak Island.

Adoption of this proposal would also result in misalignment between Federal and State regulations in Unit 10, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: While adopting this proposal would decrease opportunity, wolverines are not being harvested in Unit 10 and may not even occur in the unit anymore. Regardless, harvest opportunity is not warranted for an extremely low or even nonexistent population.

PROPOSAL 58 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 13.

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.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as this is a drawing hunt with a limited number of permits. The Unit 13A moose population is within State management objectives and can sustain limited antlerless moose harvest. The hunt is also closely managed through permit numbers, which ensures sustainable harvests.

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

Rationale: No conservation concerns exist as the antlerless hunt is closely managed through permit numbers and monitoring of the Unit 13 moose population.

PROPOSAL 62 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.

Establish an antlerless moose season in Unit 13E.



Current Federal Regulations:

Unit 13E—Moose

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

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as this is a drawing hunt with a limited number of permits. The Unit 13E moose population has been within or above State management objectives and can sustain limited antlerless moose harvest. The hunt would also be closely managed through permit numbers, which ensures sustainable harvests.

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

Rationale: No conservation concerns exist as the antlerless hunt would be closely managed through permit numbers and monitoring of the Unit 13E moose population.

PROPOSAL 71 – 5 AAC 85.057. Hunting seasons and bag limits for wolverine.
Lengthen the wolverine hunting season in Unit 13.

Current Federal Regulations:

Unit 13—Wolverine (Hunting)

1 wolverine *Sep. 1 – Feb. 28*

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users by providing a longer season under State hunting regulations. No impact to the wolverine population is expected as unlimited harvest is allowed under trapping regulations, and wolverines may be shot under a trapping license.

Adopting this proposal would almost align State and Federal seasons for wolverine hunting in Unit 13, decreasing regulatory complexity and user confusion. During leap years, the State season would be one day longer than the Federal season.

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



Rationale: No conservation concerns exist. This proposal would increase opportunity for Federally qualified subsistence user and align State and Federal hunting seasons.

PROPOSAL 72 – 5 AAC 84.270. Furbearer trapping.

Extend the wolverine trapping season in Unit 13.

Current Federal Regulations:

Unit 13—Wolverine (Trapping)

No limit

Nov. 10 – Feb. 28

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users by providing a longer season under State trapping regulations. Minimal impact to the wolverine population is expected as current harvest limits for trapping are ‘no limit’ and the Federal wolverine trapping season already extends until Feb. 28. Adopting this proposal would almost align State and Federal seasons for wolverine trapping in Unit 13, decreasing regulatory complexity and user confusion. During leap years, the State season would be one day longer than the Federal season.

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

Rationale: Minimal conservation concerns exist. This proposal would increase opportunity for Federally qualified subsistence user and align State and Federal trapping seasons.

PROPOSAL 73 – 5 AAC 84.270. Furbearer trapping.

Extend the wolverine trapping season in Unit 13.

See comments for Proposal 72.

PROPOSAL 76 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Extend the ptarmigan season and the lower bag limit in Unit 13B and 13E.

Current Federal Regulations:

Unit 13—Ptarmigan (Rock, Willow, and White-tailed)

20 per day, 40 in possession

Aug. 10-Mar. 31.

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



Impact to Federal subsistence users/wildlife: Extending the season would increase, while lowering the harvest limit would decrease opportunity for Federally qualified subsistence users. Conservation concerns exist for ptarmigan in Unit 13 as populations have declined, particularly along the road-accessible areas in Units 13E and 13B where harvest pressure is highest. Extending the season could exacerbate these concerns as ptarmigan are easier to hunt during March when they are entering the breeding season and less prone to flying. Additionally, late winter (mid-February-March) harvest mortality historically accounted for 60% of the Unit 13 ptarmigan harvest, appears to be additive, and contributed to the population declines. State regulations changed in 2018 and more time is needed to assess the effectiveness of these regulation changes before making additional changes (OSM 2019).

Federal subsistence and State ptarmigan regulations are currently misaligned in Unit 13 and would continue to be misaligned if this proposal is adopted, contributing to regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: Conservation concerns exist for ptarmigan in Unit 13. Extending the season to March 31 could result in higher harvests and additive mortality, preventing population recovery.

Literature Cited

OSM. 2019. Staff analysis WSA19-08. Office of Subsistence Management, USFWS. Anchorage, AK. <https://www.doi.gov/subsistence/wildlife-special-actions>. Accessed October 6, 2020.

PROPOSAL 84 – AAC 85.045. Hunting seasons and bag limits for moose.
Establish an antlerless moose season in Unit 16B.

Current Federal Regulations:

Unit 16—Moose

Unit 16B-Redoubt Bay Drainages south and west of, and including the Kustatan River drainage—1 bull Sep. 1-15.

Unit 16B-Denali National Preserve only—1 bull by Federal registration permit. One Federal registration permit for moose issued per household Sep. 1-30.
Dec. 1-Feb. 28.

Unit 16B, remainder—1 bull Sep. 1-30.
Dec. 1-Feb. 28.

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



Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as the proposed hunts are a Tier II and drawing hunt with a limited number of permits. The Unit 16B moose population is currently above State management objectives and can sustain limited antlerless moose harvest. The hunt would also be closely managed through permit numbers, which ensures sustainable harvests.

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

Rationale: No conservation concerns exist as the antlerless hunt would be closely managed through permit numbers and monitoring of the Unit 16B moose population.

PROPOSAL 98 – 5 AAC 84.270. Furbearer trapping.
Extend the beaver trapping season in Unit 16.

Current Federal Regulations:

Unit 16—Beaver

No limit

Oct. 10 – May 15.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users. Beaver are considered common in the region according to trapper questionnaires, mitigating conservation concerns.

Federal subsistence and State beaver regulations are currently misaligned in Unit 16 and would continue to be misaligned if this proposal is adopted, contributing to regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: No conservation concerns exist and harvest opportunity would increase.



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503



In Reply Refer to:
FWS/IR11/20139

DEC 11 2020

Mr. Stosh Hoffman, Chairman
Attention: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

The Alaska Board of Game (Board) is scheduled to meet at to be determined dates to deliberate proposals concerning changes to Statewide regulations governing hunting and trapping of wildlife. We have reviewed the 90 proposals the Board will be considering at this meeting.

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

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, Office of Subsistence Management, State Subsistence Liaison, 907-317-2165 or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Sue Detwiler
Assistant Regional Director
Office of Subsistence Management

Enclosure



cc: Chair, Federal Subsistence Board
Deputy Assistant Regional Director, Office of Subsistence Management
Policy Coordinator, Office of Subsistence Management
State Subsistence Liaison, Office of Subsistence Management
Wildlife Division Supervisor, Office of Subsistence Management
Subsistence Regional Advisory Council Coordinators,
Office of Subsistence Management
Chair, Southeast Alaska Subsistence Regional Advisory Council
Chair, Southcentral Alaska Subsistence Regional Advisory Council
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council
Chair, Bristol Bay Subsistence Regional Advisory Council
Chair, Yukon Kuskokwim Delta Subsistence Regional Advisory Council
Chair, Western Interior Alaska Subsistence Regional Advisory Council
Chair, Seward Peninsula Subsistence Regional Advisory Council
Chair, Northwest Arctic Subsistence Regional Advisory Council
Chair, Eastern Interior Alaska Subsistence Regional Advisory Council
Chair, North Slope Subsistence Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Statewide Regulations

March 12-19, 2021

Fairbanks, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 130 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.

Prohibit the use of deer or elk urine as bait or natural scent lures.

Current Federal Regulations:

§__.25(a) *Definitions. The following definitions apply to all regulations contained in this part:*

Scent lure (in reference to bear baiting) means any biodegradable material to which biodegradable scent is applied or infused.

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

Impact to Federal subsistence users/wildlife: This proposal could benefit wildlife populations by preventing the infection and spread of chronic wasting disease (CWD). While CWD has not been detected in Alaska, preventing disease is much easier than mitigating its spread once detected. This proposal could burden subsistence users who would no longer be able to use cervid urine as a scent lure.

Of note, the definition for scent lure under Federal subsistence hunting regulations pertains only to bear baiting and contains no prohibition on any cervid urine. As such, cervid urine can be used as a scent lure under Federal subsistence hunting regulations. Adoption of this proposal would result in misalignment between State and Federal regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: OSM supports preventing the transmission of disease to maintain healthy wildlife populations. However, to be truly effective, a similar proposal needs to be submitted to the Federal Subsistence Board.

PROPOSAL 131 – 5 AAC 92.210. Game as animal food or bait.

Allow the use of game bird wings and backs to be used for trapping bait.

Current Federal Regulations:

§ 100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

(j)(1) You may not use wildlife as food for a dog or furbearer, or as bait, except as allowed or in §100.26, §100.27, or §100.28, or except for the following:

(i) The hide, skin, viscera, head, or bones of wildlife;

(ii) The skinned carcass of a furbearer;



(iii) *Squirrels, hares (rabbits), grouse, or ptarmigan; however, you may not use the breast meat of grouse and ptarmigan as animal food or bait;*

(iv) *Unclassified wildlife.*

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

Impact to Federal subsistence users/wildlife: While the Board does not have authority over edible meat requirements for migratory birds, including swans, geese, and cranes, it does have authority over what can be used as trapping bait. Currently, Federal and State regulations do not permit using animal parts that are required for human consumption as bait. This proposal would result in misalignment of State and Federal regulations, which could result in user confusion and regulatory complexity. While using wing and back meat as bait may benefit some Federally qualified subsistence users by providing additional options for bait, others may view it as wasteful. No effects to wildlife populations are expected from this proposal.

Additionally, the edible meat salvage requirement under Federal migratory bird regulations recently changed to include the meat from the breast, back, thighs, legs, wings, gizzard, and heart of all migratory birds. While this requirement is more restrictive than State regulations, subsistence users supported restricting themselves to better align with traditional subsistence uses of migratory birds. Most subsistence users desire to utilize more of the bird for human consumption.

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

Rationale: This proposal requests allowing meat required to be salvaged for human consumption to be used as trapping bait. It would also misalign Federal and State regulations, creating user confusion and regulatory complexity.

PROPOSAL 132 – 5 AAC 92.990. Definitions. 5 AAC 92.210. Game as animal food or bait. 5 AAC 92.220. Salvage of game meat, furs, and hides.
Allow bird wings and parts to be used for trapping.

[See comments for Proposal 131.](#)

PROPOSAL 170 – 5 AAC 92.450. Description of game management units.
Modify the Unit 1C and Unit 4 boundaries.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(n)(1)(iii) Unit 1C consists of that portion of Unit 1 draining into Stephens Passage and Lynn Canal north of Cape Fanshaw and south of the latitude of Eldred Rock including Berners Bay,



Sullivan Island, and all mainland portions north of Chichagof Island and south of the latitude of Eldred Rock, excluding drainages into Farragut Bay.

(n)(4)(i) Unit 4 consists of all islands south and west of Unit 1C and north of Unit 3 including Admiralty, Baranof, Chichagof, Yakobi, Inian, Lemesurier, and Pleasant Islands.

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

Impact to Federal subsistence users/wildlife: If this proposal is adopted, Federally qualified subsistence users would need to abide by the State Unit 1C regulations on Pleasant and Porpoise islands. However, as these islands are part of Tongass National Forest, Federally qualified subsistence users could continue hunting on these islands under the Federal subsistence hunting regulation for Unit 4. As Unit 1C has a black bear season, whereas Unit 4 does not, adopting this proposal would increase harvest opportunity for black bear by Federally qualified subsistence users on Pleasant and Porpoise islands under State regulations.

Adopting this proposal would result in more conservative State regulations for deer on Pleasant and Porpoise Islands. While ADF&G cites conservation concerns and unsustainable harvest for deer on these islands under the current Unit 4 regulations, including harvest by Federally qualified subsistence users under Federal regulations, Federal regulations and harvest would not be affected by this proposal.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: This proposal would misalign State and Federal unit boundaries for Units 1C and 4, creating user confusion and regulatory complexity. A similar proposal would need to be adopted by the Federal Subsistence Board to fully address the conservation and overharvest concerns for deer stated by the proponent, ADF&G.

PROPOSAL 171 – 5 AAC 92.450. Description of game management units.

Divide Unit 19A into two subunits.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(n)(19)(i)(A) Unit 19A consists of the Kuskokwim River drainage downstream from and including the Moose Creek drainage on the north bank and downstream from and including the Stony River drainage on the south bank, excluding Unit 19B.



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

Impact to Federal subsistence users/wildlife: No impact to Federally qualified subsistence users or wildlife is expected from adopting this proposal.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: This proposal would misalign State and Federal unit boundaries for Unit 19, increasing user confusion and regulatory complexity.

PROPOSAL 173 – 5 AAC 92.530(7). Management areas.
Repeal the Dalton Highway Corridor Management Area.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(20)(ii)(C) You may not use firearms, snowmobiles, licensed highway vehicles or motorized vehicles, except aircraft and boats, in the Dalton Highway Corridor Management Area, which consists of those portions of Units 20, 24, 25, and 26 extending 5 miles from each side of the Dalton Highway from the Yukon River to milepost 300 of the Dalton Highway, except as follows: Residents living within the Dalton Highway Corridor Management Area may use snowmobiles only for the subsistence taking of wildlife. You may use licensed highway vehicles only on designated roads within the Dalton Highway Corridor Management Area. The residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, Stevens Village, and residents living within the Corridor may use firearms within the Corridor only for subsistence taking of wildlife.

Note: The exact same regulation is found in: (24)(ii)(A); (25)(ii)(A); and (26)(ii)(B)

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

Impact to Federal subsistence users/wildlife: A repeal of the Dalton Highway Corridor Management Area (DHCMA) would have a significant impact on Federally qualified subsistence users living within the DHCMA and residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, and Stevens Village, as they currently can use snowmobiles and firearms to take wildlife within the DHCMA. If this proposal is adopted, competition with other Alaska residents would increase and would likely result in lower success rates and decreased opportunity for local subsistence users.



Caribou populations from the Teshekpuk Caribou Herd (TCH), Western Arctic Caribou Herd (WCH), and the Central Arctic Caribou Herd (CACH) have ranges that overlap the DHCMA. Repeal of the DHCMA is not recommended as this would increase the disturbance from hunting pressure on caribou and other wildlife populations.

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

Rationale: Repealing the DHCMA may create a conservation concern for caribou and other wildlife due to increased access and disturbance from snowmachines and firearms. Retaining the DHMCA allows caribou to move more freely with less disturbance during migration, and provides better opportunity and a rural subsistence priority for Federally qualified subsistence users.

PROPOSAL 174 – 5 AAC 85.045(a)(1). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose seasons in Unit 1C.

Current Federal Regulations:

Unit 1C–Moose

Unit 1C—that portion south of Point Hobart including all Port Houghton drainages—1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on one side, or antlers with 2 brow tines on both sides, by State registration permit only Sep. 15-Oct. 15.

Unit 1C, remainder, excluding drainages of Berners Bay—1 bull by State registration permit only Sep. 15-Oct. 15.

Unit 1C—Berners Bay—1 bull by drawing permit Sep.15-Oct. 15
(will be

Only one moose permit may be issued per household. A household receiving a State permit for Berners Bay drainages moose may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Juneau office, in consultation with ADF&G. The Federal harvest allocation will be 25% (rounded up to the next whole number) of bull moose permits announced starting in 2019).

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

Impact to Federal subsistence users/wildlife: Both antlerless moose seasons in Unit 1C are by draw permit only and ADF&G has the management authority to determine how many permits to issue each year. As Unit 1C moose populations do not currently support any antlerless harvest, ADF&G has indicated no permits will be issued this year. Therefore, no impacts to Federally qualified subsistence users or wildlife are expected from adoption of this proposal.



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

Rationale: While the Unit 1C moose populations do not currently support any antlerless moose harvest, reauthorizing these draw permit-only seasons maintains management flexibility for ADF&G to provide more harvest opportunity in the event that populations increase to a level warranting antlerless harvest.

PROPOSAL 175 – 5 AAC 85.045(a)(3). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose hunt in Unit 5A, Nunatak Bench.

Current Federal Regulations:

Unit 5A–Moose

Unit 5A-Nunatak Bench—1 moose by State registration permit only. The season will be closed when 5 moose have been taken from the Nunatak Bench Nov. 15-Feb. 15.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users, although this hunt has not occurred in recent years due to a low moose population. If this proposal is adopted, Federal and State regulations would maintain alignment, decreasing regulatory complexity and user confusion.

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

Rationale: While the Nunatak Bench moose population does not currently support any antlerless moose harvest, reauthorizing this quota-managed hunt maintains management flexibility for ADF&G to provide more harvest opportunity in the event that the population increases to a level threatening habitat damage and warranting antlerless harvest.

PROPOSAL 176 – 5 AAC 085.045(4). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 6C.

Current Federal Regulations:

Unit 6C–Moose

Unit 6C—1 antlerless moose by Federal drawing permit only Sep. 1-Oct. 31.

Permits for the portion of the antlerless moose quota not harvested in the Sep. 1-Oct. 31 hunt may be available for redistribution for a Nov. 1-Dec. 31 hunt.



Unit 6C—1 bull by Federal drawing permit only

Sep. 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 annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. 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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users, although this hunt has not occurred in recent years because the antlerless moose quota has been met under Federal regulations. As this hunt is closely managed by a joint State/Federal harvest quota, no impact to the moose population is expected if this proposal is adopted.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. While the Unit 6C moose population does not currently support additional antlerless moose harvest under State regulations, reauthorizing this season maintains management flexibility for ADF&G to provide more harvest opportunity in the event that the available antlerless harvest quota is not met under Federal regulations or if warranted by population or habitat conditions.

PROPOSAL 177 – 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, 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. 10-Sep. 20.

Unit 14—Moose

No Federal open season

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



Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as this is a drawing hunt with a limited number of permits. These hunts are closely managed through permit numbers, which ensures sustainable harvests. These antlerless hunts also help reduce over-browsing of habitat and moose-vehicle collisions.

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

Rationale: No conservation concerns exist as the antlerless hunt is closely managed through permit numbers; these hunts also provide additional hunting opportunity.

PROPOSAL 181 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.
Reauthorize the resident antlerless moose season 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 *Sept. 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—2 moose, only one of which may be antlered. Antlered bulls may not be harvested from Oct. 1 through Nov. 30 *Aug. 1-Apr. 30.*

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Unit 18, remainder moose population is very high, continues to grow and can support additional harvest. While the Goodnews River drainage moose population can support some additional harvest, the antlerless moose season can be closed by Emergency Order if needed, and the quota has not been met in recent years.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and these moose populations can withstand additional harvest.



PROPOSAL 182 – 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 Sep. 1-30.

Unit 19D-remainder of the Upper Kuskokwim Controlled Use Area—1 bull Sep. 1-30.

Dec. 1-Feb. 28.

Unit 19D, remainder—1 antlered bull Sep. 1-30.

Dec. 1-15.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Unit 19D moose population is exhibiting signs of nutritional stress as evidenced by low twinning rates, warranting antlerless harvest to help stabilize the population and curtail over browsing of habitat.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and this moose population warrants additional harvest.

PROPOSAL 186 – 5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.

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

Current Federal Regulations:

Unit 21D–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
Sept. 5 - 25

Antlerless moose may be taken only during Sept. 21 - 25 season if authorized jointly by the Koyukuk/Nowitna/Innoko NWR manager and BLM Central Yukon field office manager Mar. 1 - 31

Antlerless moose may be harvested during any of the winter seasons. Season may be announced.

Harvest of cow moose accompanied by calves is prohibited.



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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Kaiyuh Flats moose population is growing rapidly and can support additional harvest.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. A harvestable surplus of moose exists in Kaiyuh Flats area of Unit 21D, and additional cow moose harvest may help this population grow at a more sustainable rate.

PROPOSAL 187 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.
Reauthorize a winter any-moose season during part of February and March in Unit 21E.

Current Federal Regulations:

Unit 21E–Moose

Unit 21E—1 moose; however, only bulls may be taken from 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 River during the winter season Feb. 15-Mar. 15.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The moose population in Unit 21E is growing, beginning to show signs of nutritional stress, and can support additional harvest.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. A harvestable surplus of moose exists in Unit 21E, and additional harvest may help stabilize the population and prevent overutilization of the habitat.

PROPOSAL 188 – 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose season in the western portion of Unit 26A.



Current Federal Regulations:

Unit 26A–Moose

Unit 26A—that portion west of 156°00' W longitude excluding the Colville River drainage—1 moose, however, you may not take a calf or a cow accompanied by a calf July 1-Sep. 14.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. However, Federally qualified subsistence users would still be able to harvest antlerless moose under Federal subsistence regulations if this season is not reauthorized under State regulations. While the moose population is very sparse in this area, hunting pressure and harvest is extremely low, minimizing conservation concerns.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and low harvest pressure minimizes conservation concerns.

PROPOSAL 189 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

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

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

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.

PROPOSAL 190 – 5 AAC 92.015. Brown bear tag fee exemptions.

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

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

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.

POINT MACKENZIE COMMUNITY COUNCIL



PC10
1 of 3

20810 West Mackenzie RD
Wasilla Alaska 99623
(907) 671-0003

Friday, October 23, 2020

President Gary Foster

Fish and Wildlife
Boards and Support Section
PO Box 115526
Juneau, AK 99811-5526

During our Point Mackenzie Community Council meeting on 10-8-2020 a motion was unanimously made by the audience to send this letter (attached) to you the Department of Fish and Game, Boards Support Section, regarding Moose Hunt Proposal 79-Palmer Area. Mr. Gary Johnson of Point Mackenzie spoke about the Proposal 79-Palmer Area Moose Hunt. Local residences were surprised to hear about the upcoming November moose hunt in light of our local dwindling moose herd numbers. Our residence agreed that there are fewer moose, area wide, have been seen both from our local herd, or the migrating herds. The lower population does not appear to be from natural causes such as wolves or bear, and given that there are fewer vehicles on the roads since Covid-19 we are concerned.

We had numerous people concerned as well about the large number of calves in the area without cows being with them. As we know the calves without assistance from the cow will not survive the winter. If your regulations state that they should look for calves before for shooting a cow that is not being adhered to this is just another reason we with the Community Council are asking for the cow season in this area to be closed.

The Point Mackenzie Community Council would like to invite you to attend the next meeting and address our community's concerns. Our next meeting will be on Thursday December 12, 2020. Thank you for your assistance in this matter.

Sincerely,

Point Mackenzie Community Council
Gary Foster, President



Every year the cow and antler-less permit hunts are renewed and every year our resident moose herd at Point MacKenzie is reduced until in 2020 the numbers have become alarmingly low. **NO** more cow or antler-less moose hunts should be permitted for the Point MacKenzie / Port MacKenzie / Big Lake area.

Discussion:

Point MacKenzie is a major wintering area for migratory moose. Moose radio collared in the Talkeetna Mountains have wintered at Point Mackenzie (adfg 2005). We winter a large number of moose that move in from the refuge and areas farther west. Moose will move up to 60 miles into wintering areas. Other moose only move a few miles and those are our local herd (fs.fe.us, 2010).

Using a February 2019 fly over as a basis for local moose population is not good data. Most of those moose will move back out of the area in the spring. Some will not even be in the 14A hunt area May through November. They will not be available for harvest during the regular September hunting season. This leaves our local breeder cows to absorb all the pressure from cow, antler-less and youth cow permits. In addition; a moose count in February does not take into consideration winter kill as those moose normally start to die off in March. Moose cows killed with calves result in 100% mortality for the calves (adfg study). Poaching also increases our mortality rate. All of this has resulted in our local moose herd numbers getting dangerously low. But the cow / antler-less permits are the largest factor.

Kills Port MacKenzie 402 Permit Area and Big Lake 403 Permit Area:

75 in 2016

74 in 2017

74 in 2018

70 in 2019 (adfg harvest data look up).

2020 data not available at the time of this writing.

The goals of the cow / antler-less hunts are to reduce numbers for forage areas and road kill. Large areas of of prime first year growth willow in the Point MacKenzie area are not being browsed. The vehicle traffic is not that high on our local roads and hunting kills in our area does little to reduce vehicle collision in the valley's more populated areas.

Using the the Nuisance Moose hunts to control moose in high vehicle traffic corridors would be more effective.

The Point MacKenzie / Big Lake area is easily accessed by hunters from the valley and Anchorage. It is a popular area and receives a lot of hunting pressure every season. Enough pressure so that if there is a legal bull in the area it is probably going to get harvested.

Letting our local breeder cow numbers return to a reasonable level will result in more legal spike fork and 3 brow tine bulls ending up in hunter's freezers.



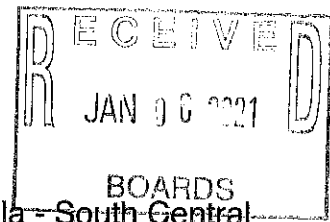
COMMENT REFERENCES:

adfg representative, personal narrative

<https://www.fs.fed.us/database/feis/animals/mammal/alam/all.html#RangeExpansionAndContraction>

http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/research_pdfs/73_mo_calv_johnson_etal.pdf

https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvest.lookup&_ga=2.41532832.309731784.1602177935-1713910922.1387037100



Board of Game meeting originally scheduled January, 2021 in Wasilla - South-Central Area Unit 14



PC11
1 of 1

Comment: Gary Thompson, Point Mackenzie resident.

NO on Proposal 79! NO more cow hunts.

Using a February flyover to determine local moose numbers is wrong. It counts a very large number of moose that move into the Point Mackenzie area as a wintering area. Those moose are not here for the general season. That leaves our local breeder cows to absorb all the cow permits issued for the August 25 - September 25 permit hunts. Our local herd numbers are way down. And those are the cow moose we depend upon to produce spike / forks and draw in legal bulls toward the end of general season. And yes, records will show that legal bulls are still being shot in the Point Mackenzie / Big Lake area, but the hunting pressure is intense with a very large number of hunters. If a legal bull is around, he is going to get shot.

If F&G wants to cut down on the number of moose / vehicle incidents; then using the nuisance moose hunts in high traffic corridors would be more effective. Shooting out our cows at the end of the road system with moderate traffic doesn't do that.

The general season ends September 25 just as the rut is beginning. I think Youth Permits should be encouraged. These should be set up for a time frame in October for BULLS when more bulls move into the area and are easy to call in using bull grunts and cow calls.

If F&G wants to sell permits, then an October hunt permit for "Any Bull" would be a very popular and not decimate the local cow herds.

If F&G insists on antler-less permits, then they should only be issued for December when moose migrate into their wintering grounds and the bulls start to shed antlers.

Think about it. You're shooting that cow; the calf or calves that are with it are going to die also. If the cow has been bred then the calf in her womb isn't going to be born next Spring. To harvest one animal you're killing at least 3 moose.

Residents in the Point Mackenzie / Big Lake area are tired of having orphan calves die in their yard. And everyone is upset about our local moose numbers going down. Speaking with outdoorsmen and naturalists in the Willow, Meadow Lakes, and Knik areas, all say their local breeder cow numbers are down.

That February flyover in 2019 - this biologist is not a good biologist.



Submitted By
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Submitted On
3/1/2021 12:37:48 PM
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Address
4506 Prospect Way
Juneau, Alaska 99801

I strongly oppose doubling up on meetings. There are many reasons this would be a poor decision.



Submitted By
Aaron J Bloomquist
Submitted On
1/27/2021 2:20:12 PM
Affiliation

Phone
9079822471

Email
bloomya@hotmail.com

Address
po box 126
copper center, Alaska 99573

I respectfully request the Board of Game re-open the call for Central/Southwest and Statewide proposals. I don't really care if this year's proposals are totally eliminated and we start over or if we add new proposals to those already on the books. It was not long ago that we could address issues every other year and this would push the next opportunity out 4 years. I especially think it is important for the statewide cycle. 4 years is a lifetime in the cycle of wildlife in some areas and even in hunting technology. Covid has also raised some questions that should be addressed in new proposals.

Thank You for your consideration,

Aaron Bloomquist



Dear members of the Board of Game,

The current Board of Game meeting notice indicates you will be discussing "the option for reissuing the Call for Proposals for the 2022 Central/South West Region and the 2022 StateWide Regulations meetings. I strongly urge that you approve this option and allow the submission of new proposals for those meetings in 2022. There will be important data compiled by then related to moose, brown bear, and perhaps emperor geese which will justify some new proposals. This will help the Board consider proposals which are based on more current data in the next cycle. Your consideration of this request is greatly appreciated.

Sincerely,

Joe Klutsch

--

Joe Klutsch
Katmai Guide Service
Master Guide 91

Po Box 313
King Salmon, Alaska 99613
(907) 246-3030
www.katmaiguideservice.com
joeklutsch@gmail.com

MATANUSKA-SUSITNA BOROUGH

350 E Dahlia Ave., Palmer AK 99645 Ph.907.861-8606



PC15
1 of 2

CHAIRPERSON

Mike Wood

VICE CHAIR

Howard Delo

MSB STAFF

Ted Eischeid



BOARD MEMBERS

Tam Boeve

Andy Couch

Larry Engel

Tim Hale

Pete Probasco

Kendra Zamzow

Ex officio: VACANT

MSB FISH AND WILDLIFE COMMISSION

Memorandum

February 19, 2021

dfg.bog.comments@alaska.gov

907-465-6094 FAX

ADF&G Board Support Section
ATTN: Board of Game Comments
PO Box 115526
Juneau AK 99811-5526

Dear Chairman Daele and Board of Game Members,

The Matanuska-Susitna Borough Fish and Wildlife Commission was created in 2007 to advocate on fish and wildlife issues for the Mat-Su Borough and its citizens. We have a strong interest in fish and wildlife issues that impact the quality of life for the borough, which is the fastest growing region in Alaska, and where many enjoy abundant fish and wildlife.

Regarding your decision to postpone public meetings to consider 2020 —2021 Board of Game proposals until next fall / winter's cycle, the MSB Fish and Wildlife Commission would encourage the Board to provide the public an opportunity to submit new game proposals, along with an opportunity for groups or individuals to amend and/or withdraw game proposals they had previously submitted for the 2020—2021 meeting cycle.

We believe this approach will provide for more carefully worded proposals, will allow the incorporation of the most recent biological data, and may help the public and board support and adopt better game regulations during the Board meetings rescheduled for next winter.



Thank you for your consideration of providing additional public input as a result of unforeseen delays caused by COVID-19 concerns.

Sincerely,



Mike Wood, Chair



unapologetically **FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

March 5, 2021

Board of Game Special Regulatory Meeting – March 18, 2021

Allow New Proposals to be Submitted for the
Central/Southwest & Statewide Meetings

Dear Chairman Van Daele and Board members,

With the postponement of the 2021 cycle meetings to 2022, it has now been 11 months since the deadline to submit proposals for those meetings. The harvest and biological data and hunter experiences in the field many take into account in order to submit proposals for those meetings was from 2019.

Much has changed since 2019, which is why we support allowing new proposals to be submitted for these meetings.

The board discussed this matter earlier this year and tabled a decision until this meeting. During that discussion there were concerns among some board members that if new proposals are allowed to be submitted, some members of the public would use existing proposals they didn't agree with to submit counter proposals. There were also concerns that allowing new proposals to come in would lead to too many proposals for the board to reasonably address at the 2022 meetings.

The pandemic that caused the Board to postpone meetings a year and move every future meeting out of cycle to a year later is unprecedented. So are decisions the Department and the Board has already had to make to address hunting issues surrounding the pandemic. This is no different.

This decision now, whether or not to allow new proposals to come in, needs to be realistically addressed so that we have fair and equitable public involvement in our wildlife management process, which is second to none in the nation.

By our count, there are currently 98 proposals for the Central/Southwest meeting and 171 for the Statewide meeting. (Antlerless reauthorizations and brown bear tag fee exemptions are not included, as they will be addressed at this meeting). Many of the proposals outside of antlerless reauthorizations and tag fee exemptions are from the Department. Surely the Department, and members of the public, may want to revise or submit new proposals based on new information. It's possible some may ask to rescind proposals based on new information.

We see no avenue for any changes the public or Department want to address for these meetings to be addressed with Agenda Change Requests, as those are "*not intended to address proposals that could have been submitted by the deadline*"



scheduled for submitting proposals.” The board should carefully consider that some issues may need to be addressed via new proposals that fall under the guidelines in the ACR policy for acceptance but won't be allowed as ACRs for these meetings.¹

Surely the authors of any proposals, whether the public or Department, should be allowed to revise their proposal(s) based on new information. Any duplicate or similar proposals that come in can be conjoined and the board can address the original and take no action on the others, as is commonly done already with numerous proposals. New proposals based on new information can add to the Board's workload, but as said earlier, this is all unprecedented and calls for special actions (and time) by the Board.

In closing, Resident Hunters of Alaska respectfully request that the Board allow new proposals to be submitted for the postponed 2020/2021 Region IV and Statewide cycle meetings by May 1st of this year. The pros to allowing new proposals to come in far outweigh the cons, and there are several ways the Board and Board Support can address some of the concerns they may have.

Thank you for your time and your service!

Sincerely,

Mark Richards – Executive Director Resident Hunters of Alaska

¹ https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/bog_acr_policy_2018.pdf



Submitted By
Monica Baldrige
Submitted On
3/5/2021 7:22:34 AM
Affiliation

Phone
907-250-7970

Email
monicame25@hotmail.com

Address
12800 Chapel Drive
Anchorage, Alaska 99516

Please allow this young man's family to take his hunt.



Submitted By
Savanah Bonfield
Submitted On
3/5/2021 3:21:57 PM
Affiliation

Phone
9079528930

Email
savanahbonfield@gmail.com

Address
2080 Campbell Place
Anchorage, Alaska 99507

Chase Bowerson's name was pulled for a tag after his death, and his family requests a transfer of the tag to his immediate family member as a proxy hunt. Please consider this transfer for the family in this instance. Proxy hunts happen a lot, and Chase is not present to have the chance to submit a letter for himself for an appeal in this circumstance. This would mean a great deal to his family, and I've asked that they consider applying for a potlach hunt if this circumstance can't be addressed and changed during this meeting. However, just the same as there is allowance of transfer for someone who is disabled or gets deployed, please consider writing this in policy with those allowances in case this happens again in the future.



Submitted By
Rodney Bowerson
Submitted On
3/3/2021 6:27:13 PM
Affiliation

Phone
907-310-2505

Email
1973tinner@gmail.com

Address
12701 Brandon street
Anchorage , Alaska 99515

To whom it concerns. Regarding members of the community bequeathing drawn hunting tags to next of kin due to untimely death. I'd ask the board consider under heartbreaking, horrific situations to allow the transfer, providing the proxy put in for the same hunt . I'd ask this take place in time for the 2021 season . Friends. Please consider an outstanding mother opening the mail of her twenty two year old son recently murdered in a manner most vile . Give her this win ? Thanks



Submitted By
Whey Bowerson
Submitted On
3/3/2021 1:35:18 PM
Affiliation

Phone
9077272497

Email
Whey.bowersonhumpys@gmail.com

Address
440 w. 89th avenue
Anchorage, Alaska 99515

The inability for a hunting tag to be transferred to a next of kin or other family is a great injustice that is ongoing in our state. I suggest that the law which allows transfer of a hunting tag in the case of a 70% or higher disability be updated to include the ability to transfer a hunting tag to next of kin or immediate family who also submitted for the tag that year in the case of death.



Submitted By
Danielle Campoamor
Submitted On
3/4/2021 4:24:03 PM
Affiliation

Phone
206-265-2857

Email
campoad13@gmail.com

Address
93 MacDougal Street
APT 1
Brooklyn, New York 11233

I am a born and raised Alaskan currently living in Brooklyn, NY. On Jan. 2, in the midst of an ongoing deadly pandemic clear across the country, I witnessed my family members grieve an unspeakable loss when my cousin, Chase Bowerson, was murdered. To hear the pain in my mother's voice -- the voice of a mom who heard, in real-time, the guttural sobs of a mom in mourning over the senseless loss of her baby boy. I heard the pain in Kelly voice, Chase's mom, as she described her new reality: a split in time that has now given her the Before Chase, and After Chase.

And then I heard it again, when Chase's name was pulled for a controlled moose hunt tag and my family was told that Fish and Game, under Statute 16.05.405, could not transfer the tag to an immediate family member. Chase's father and two brothers also put in tags. As fate would have it, none of their names were pulled.

While I am aware that legislation must be introduced and passed at the state legislative level, then signed into law by the governor in order to rectify this unnecessarily cruel statute, that does not mean that there is nothing the Board of Game can and, most importantly, should do.

I am requesting that the board give their fullthroated support to our ongoing attempts to chang this legislation. I am requestion that the board send a letter to the state senate urging them to bring legislation forward that will schange this statute. I am also requesting that this matter be discussed as soon as a meeting that includes public testimony occurs. I am also requesting that the board look into why Alaska Commercial Fisheries Entry Commission, the agency that manages commercial fishing permits, has statutes regarding permit transfers upon the death of a permittee. They are under [AS 16.43.180\(b\)](#). Yet this statute exists and is currently harming not commercial fisheries, but bereaved Alaskan residents.

That Alaskans are facing a myriad issues at the moment is not lost on me or members of my family. As someone who lives in what at one point was the epicenter of the ongoing Covid-19 pandemic — I get it. Alaskans are losing their jobs, their family members and loved ones, and struggling to pay rent and provide food for their families. They're isolated and alone; their mental health is suffering and alcohol and substance abuse is on the rise; instances of domestic and child abuse are growing exponentially. This is not lost on any of us.

But any law or statute, no matter how small or seemingly insignificant, that causes unnecessary harm to bereaved people is wrong. And at a time when parents, especially working moms, are managing at-home e-learning while working from home and maintaining their homes; at a time when entrepreneurs are forced to pivot their business models and adjust to constantly changing safety regulations in order to keep people employed; when frontline health care workers are treating the ill while they simultaneously working to mitigate the chances of them bringing the plague home to their families — well, there's not a single person on the planet who can convince me those in positions of power cannot walk and chew gum at the same time.

Please help my family in a way I simply cannot. Please make sure that this does not harm another bereaved family again. Please put your full weight and voice behind our continued efforts to change this statute, to do what you can to bring awareness of this statute to the public, and to help my father honor my cousin by changing a statute that never should have existed in the first place.

Thank you for your time and I look forward to seeing the Board get to work.



Submitted By
Teresa Campoamor
Submitted On
3/5/2021 7:36:17 AM
Affiliation

Phone
907-350-0357
Email
tcappy13@gmail.com
Address
PO Box 91534
Anchorage, Alaska 99509

Chase Bowerson, along with his father and two brothers, put in for a controller moose hunt tag, Chase was murdered January 2nd of this year. When Chase's name was pulled for that controlled moose hunt, the family was told that Fish and Game, under Statute 16.05.405, could not transfer the tag to another family member, a family member that put in for the same exact hunt.

I am requesting that the board give their complete and full support to our attempts to change this legislation. I am requesting that the board send a letter to the State Senate urging them to bring legislation forward that will change this statute.

Any law/statute that causes more suffering to a family that has already suffered such a horrific loss, the death of a loved one, should be changed. Your support behind this effort, I believe, will have a significant impact on the attempt to get this law changed.

I expect more than your consideration to this matter, I expect your full support and action to get this law changed at the legislative level.

Thank you,



Submitted By
Tye Chikigak-Steadman
Submitted On
3/5/2021 12:33:15 PM
Affiliation

Phone
9079800243

Email
tyesteadman@gmail.com

Address
10876 E Timber Country Cir
Palmer, Alaska 99645

To whom it may concern,

I am writing on behalf of support for the family of Chase Bowerson (deceased.) Recently I've been informed of a unique situation where Mr. Bowerson was drawn for an ADFG hunting tag. Unfortunately Chase recently passed away and the family wants to honor him by filling the hunting tag. By not allowing the transfer to an immediate family member I believe the family and the late Mr. Bowerson are being done a great disservice. Please allow the transfer or create a policy to handle this situation moving forward.

Sincerely, Tye Chikigak-Steadman



Submitted By
Justin Clouser
Submitted On
3/3/2021 7:10:33 PM
Affiliation

Phone
907-903-7124

Email
Clouser.Justin.314@gmail.com

Address
2809 Klamath Dr Unit 1
Anchorage , Alaska 99517

Dear Fish and Game,

I lost a great buddy this year in a tragic way. Chase Bowerson was on those people that everyone should know and could learn from. He got his first tag this year for a moose and he was pumped. Now that he has passed, his brother or father want to get this moose for there loved one, it would be a great honor to a grieving family. Please change the regulations for future generations, if experience the same tradegy can fulfill there fallen loved ones Alaskan dream of a moose hunt. Please really consider how much this would mean to their family.



Submitted By
Sierra Colbry
Submitted On
3/4/2021 8:17:32 PM
Affiliation

My comment is in regards to hunting tags. If someone's name is pulled and they have passed, the tag should be given to their family member. The grieving family shouldn't be robbed from anymore than they already have. This issue needs to be fixed accordingly. Why is it right, you pull a name and not reward tag to the family of the recently deceased. If their name is pulled, and they are unable to physically use the tag (whether it's death or anything else) , they reward it to the next immediate family member who is able to hunt. Do right.



Submitted By
Bryson Corbett
Submitted On
3/5/2021 8:45:38 AM
Affiliation

Phone
9073106363

Email
brysonjcorbett@gmail.com

Address
20209 Chapel Drive
Chugiak, Alaska 99567

I'm writing in support of a change or addition of policy regarding proxy hunting for game tags. Specifically, the change or addition to allow family members to inherit the drawn tag when the individual drawn is deceased.

Hunting and subsistence are foundations of Alaskan culture that predate modern governments. It's a sacred act of survival. Allowing drawn tags to be inherited by family will not only allow this tradition to continue, but it would give the family a unique opportunity to remember and memorialize the one who passed away.

I do not see an argument of why this change wouldn't be possible. The tag is drawn, the individual selected, the game marked for hunt. Currently, an individual may allow a proxy hunter with approval if they are Blind, Physically Disabled, 65 or older, or Developmentally Disabled. The addition of the beneficiary being deceased seems to be a logical addition.

With a Death Certificate, proof of familiar relationship, proof of proxy hunter's hunting license, and an agreement to transfer responsibility to go along with the authorization. I would believe that would be sufficient to provide a provisional proxy hunting tag.

I hope the Board considers this addition or change. It would benefit all Alaskans and help the family of the deceased grieve.



Submitted By
Erik Duwe
Submitted On
3/4/2021 6:04:53 PM
Affiliation

Phone
3603036916

Email
erik.duwe@yahoo.com

Address
2151 Astoria Circle
Apt 111
Herndon, Virginia 20170

Dear Fish and Game Board Members,

I recently lost a brother of mine in an unfortunate event. He was an avid hunter and a stellar part of his community. Hunting a moose was one of his goals, and, recently his name was pulled for a moose tag. Regretably he is not with us to perform that Alaskan tradition, but his family is. They have inquired about receiving his tag in his stead but were told that transfers to immediate family from the deceased are not currently allowed. I implore you to review this standard and to change it for the ours and future families benefit

Regards,
Erik Duwe



Submitted By
Christine Fekete
Submitted On
3/4/2021 5:05:06 PM
Affiliation

Phone
615 828 7549

Email
Chris@thinkhappystuff.com

Address
24303 Woolsey Canyon
10
West Hills, California 91304

Chase Bowerson was murdered and then received a moose liscence in the lottery. It is a travesty that his family could not use the pass.



Submitted By
Maxine Fekete
Submitted On
3/4/2021 5:09:07 PM
Affiliation

Chase Bowerson put in for a tag before he was murdered in January. His brothers and step father also put in but the board won't allow the tag to be transferred to them- which is a horrible policy. The tag should be able to be transferred to his family. Please right this wrong.



Submitted By
Arielle Gibbs
Submitted On
3/4/2021 8:04:20 PM
Affiliation

This comment is on behalf of the Bowerson/Trent family, who recently experienced the unspeakable tragedy of losing their beloved son, brother, and uncle Chase. Soon after he was taken from them, it was discovered that Chase's name had been pulled for a 2020/2021 draw hunt permit, which he obviously can no longer take for himself, and yet your department has also refused to transfer that tag to any of his other family members so that they may carry out the hunt in his honor. I am under the impression that proxy hunts are allowed in cases of deployment or physical inability, to name a few examples, so I am at a loss as to why this situation should yield any different results whatsoever; the bag limit remains the same so what exactly is the problem? The Bowerson/Trent family have been remarkable friends to me over the past 18 or so odd years that I have known them and they wholeheartedly deserve this chance to honor Chase and carry out one of his last wishes; if you can't change this illogical statute for them, please at least consider changing it for the benefit of future families, lest they end up similarly affected.



Submitted By
Michelle Goldstein
Submitted On
3/3/2021 4:49:58 PM
Affiliation

Phone
907-242-6474

Email
Michieak@hotmail.com

Address
8430 E 32nd Ave
B
Anchorage, Alaska 99504

Hello! Recently a good friend of mines son, Chase Bowerson, drew a tag for a moose this season. Unfortunately, her son was brutally murdered on the Glenn Highway by being run over by someone who he thought was his friend on January 2nd. Their family received notice last month that Chase had drawn the tag. It was just one more heart wrenching blow for them to know that Chase had finally drawn the permit, his first permit, and would not be around to take it. This meat would have been distributed to his entire family. Their hope was to be able to transfer the tag to a remaining family member in order to provide for their family in Chases name. This isn't a circumstance that happens often and my hope is that by writing this comment requesting the permit be transferred in this Extenuating circumstance to a family member so the meat intended for Chases family, goes to Chases family. Thank you for taking the time to read this.

Respectfully,

Michelle Goldstein



Submitted By
Lonny Harp
Submitted On
3/4/2021 6:18:46 PM
Affiliation
Friend

Phone
9077755669
Email
lonnyharp@me.com
Address
4680 McKean Drive
Palmer, Alaska 99645

A very dear friend Chase Bowerson was taken from all of us on January 2nd. He had dreamt to go on a family moose hunt with his pops and 2 brothers. They all had submitted for tags in hope for this dream to come true later to find that Chase's name had been pulled for a tag nearly a month after his murder. The department of fish and game will not transfer that tag to an immediate family member so that they may do this hunt in his honor. This is ridiculous and I would hope you will do the right thing and allow this already grieving family to receive that tag they deserve so they may honor their Son/ brother in a trip they will never get to experience with their lost love one.

Chase is greatly missed and loved and would have wanted nothing more than to be able to do this with/ for his family, unfortunately he is no longer here but his Tag is. Please do not add to the list of things taken from this amazing family.

Lonny A. Harp



Submitted By
Leigh Harwood
Submitted On
3/5/2021 11:56:00 AM
Affiliation

Phone
9079528233

Email
Salina.harwood@gmail.com

Address
10876
Timber Country Cir
Palmer, Alabama 99645

I am wanting to know what the reasoning for the lack of leniency for a recently deceased friend's hunting tag is about? Chase Bowerson's family trying to heal and honor him in the best way they know how seems simple. Is this a stipulation or law that needs to be updated or petitioned for change? This is not a manipulation of the system their direct family members who would have been on the hunt regardless are going to be the ones receiving the tag.



Submitted By
Sonny
Submitted On
3/4/2021 9:59:40 PM
Affiliation

Phone
9074145630

Email
Sonnyhillborn@gmail.com

Address
1945 W Lake Lucille
Wasilla , Alaska 99654

I feel very strongly that any lottery tags won should pass to next of kin. The Bowerson family has suffered a tragic loss, and that affects all of us. Alaska's a special place for a lot of reasons, but to the people who live here, being a part of this unique and caring community is important to us. I feel, that in this world where doing the right thing is often more difficult, here is a rare and simple solution that could mean a great deal to one of our own. Thank you, Sonny



Submitted By
Teresa Holbrook
Submitted On
3/5/2021 6:53:43 AM
Affiliation

Phone
907. 335-6186

Email
Poodles3AK@yahoo.com

Address
8975 N Glenn Hwy
Palmer, Alaska 99645

Helping Alaskans grieve and honor those who have passed, especially unexpected is so important. And simple. This law does not make sense to exclude the ability to transfer a tag for some who has died yet if someone became ill and couldn't use the tagging, its transferable? I would expect the law to be reversed. If you have ever lost a loved one, honoring them in this way can be a big part of the healing process. Help Alaskan heals. During this crazy pandemic, it's even more important to change this law, giving just a little peace of mind Make sense during a time when so little in the world does make sense right now Thank you



Submitted By
Geri Inama
Submitted On
3/4/2021 6:40:53 PM
Affiliation
None

Phone
907 240 8220

Email
inama.geriann@gmail.com

Address
8912 FOREST VILLAGE drive
Anchorage, Alaska 99502

I just became aware that proxy hunting is disallowed for persons who have died between applying for permit draws and the hunting season. This is a ridiculous position and the statutes must be changed to allow a proxy designated by family to utilize the permits drawn for the deceased person. Please feel free to contact me with any questions you may have.



Submitted By
Mary Jones
Submitted On
3/4/2021 9:20:15 AM
Affiliation

I understand that proxy hunts occur frequently. If you put in for a tag, pull it, and you're physically unable to go, you can present a letter from a doctor and Fish and Game will transfer the tag. If you pull a tag and you're then deployed, Fish and Game will transfer the tag.

But they will not transfer the tag if the person who paid for it ends up deceased. I would like to request that Fish & Game also make the option available to transfer the tag to a family member so that they may hunt in honor of the deceased.

thank you.



Submitted By
Phyllis Kopiasz
Submitted On
3/5/2021 12:05:30 PM
Affiliation

Phone
9072277308

Email
pkopiasz@gmail.com

Address
PO box 521253
Big Lake, Alaska 99652

Please allow the transfer of tags drawn by deceased persons to be transferred to a family member.



Submitted By
Ashley Koskela
Submitted On
3/5/2021 7:41:44 PM
Affiliation

Phone
9074409611

Email
ashleydesireekoskela@outlook.com

Address
1025 Westbury Drive
Anchorage , Alaska 99503

To whom it may concern:

The current statue regarding hunting tags needs to be changed ASAP. While the tag can be transferred under other circumstances in such a tragic situation the Trent-Bowerson family at a loss. They have suffered unimaginable loss and are being stolen from again. This family would not only use but cherish this opportunity. Along with future families in similar situations.

Please let this family have a win in their son's name. Please let something positive happen for this family and allow them to come together as they should have if Chase was still here.
#justiceforchasebowerson



Submitted By
Jennifer Ilesh
Submitted On
3/5/2021 1:01:31 PM
Affiliation

Phone
907-414-9019

Email
jslesh@hotmail.com

Address
1203 2nd st
Douglas, Alaska 99824

I'm recommending change to the statute that does not allow the transfer of a hunting tag from a deceased person to a family member. Most especially grievous when it does in any other case. Most obviously the family member either for subsistence or honorary reasons may want to use that tag.



Submitted By
Cord Lindquist
Submitted On
3/4/2021 9:40:10 AM
Affiliation

I am writing to urge you, the Alaska Board of Fish and Game, to reconsider your position on allowing proxy hunts for Alaskan hunting members who pulled a permit and passed away before the hunt could be conducted. The State allows elderly and injured Alaskans to find a proxy in order to fulfill a tag; however, this same proxy is not afforded to family members of deceased loved ones.

A specific example of this is the case of Chris Bowerson. Mr. Bowerson was a life long avid hunter who rarely got an opportunity to hunt with his family due to work. This year, however, he was able to plan a family hunting trip with his father and other family member. Luckily, Mr. Bowerson was drawn for a moose hunt. Unfortunately, Mr. Bowerson passed away before his hunt could take place. Mr. Bowerson's family would love to conduct the hunt in honor of their son and to support numerous family members by providing countless meals for their potential harvest.

By not allowing family members of deceased hunters to fulfill the hunting tags via proxy hunters, you, the Board of Fish and Game, are wasting a lawfully gained hunting tag and taking the opportunity to procure wild game meat for those in need.

Again, I strongly hope you will reconsider your stance on allowing families of deceased hunters to gain access to their hunting tags/permits through a proxy system.

Thank you for your time,

Cord



Submitted By
Scott McGillivray
Submitted On
3/4/2021 11:15:04 AM
Affiliation

To whom it may concern.

Hello and good day to you. I'll get to the point. My nephew was murdered January 2 of this year and he ended up getting a moose tag this year (the only one in his family). My nephews and brother in law were wanting to use his tag in his memory. However, you guys denied that request. Please take it in consideration of maybe being a little more open minded with sensitive issues.

Thank you for your time and good day.
Regards,

Scott McGillivray



Submitted By
Sharon McGillivray
Submitted On
3/4/2021 7:16:23 PM
Affiliation

Phone
907-250-7440

Email
Simmcgil@yahoo.com

Address
11520 Jerome St.
Anchorage, Alaska 99516

I am hoping the state will change the law to proxy for those persons who were drawn for a hunt and because of death are not able to do the hunt themselves. As I understand at this time the hunt is forfeited. Please consider supporting my position on this issue and get this law changed. Thank for your support on this issue



Submitted By
Thomas McGillivray
Submitted On
3/4/2021 7:10:25 PM
Affiliation

Phone
907-350-1237

Email
tommcgil@hotmail.com

Address
11520 Jerome St.
Anchorage, Alaska 99516

To Whom It May Concern,

My grandson Chase Bowerson put in for and received a permit for DM408 antlerless moose hunt for 2021. Chase was killed on January 2, 2021 so needless to say he won't be able to use his permit and according to the law that is in effect his permit cannot be transferred to a family member. This law has to change. There is no sensible reason these permits shouldn't be used by an immediate family member to provide meat for his family or anyone else's family who has had this situation happen to them.

Thank you for your consideration,

Tom McGillivray



Submitted By
Brennen Neithercoat
Submitted On
3/4/2021 6:32:32 PM
Affiliation
Unaffiliated

Phone
9712694520

Email
brennen.neithercoat@gmail.com

Address
3359 SE 8th Ave
Portland, Oregon 97202

To the assembled members of the Board of Fish and Game. I grew up in Alaska, and while I was never a hunter, I was always envious of the deep bonds the experience can forge between parents, children, siblings, and friends. The Bowerson family lost a son and a brother this winter. They will not get to experience the hunting trip he'd been planning for with him, because he was taken long before his time. Chase's moose tags remain unclaimed, and it's the family's wish that the state allow an immediate family member to claim the tags in his stead so that they can come together for a memorial hunt in his honor. In the interest of decency, I beseech you to grant them this wish. Grief has no cure, but memory and family can be a potent salve on that wound, please allow the Bowerson family to grieve, memorialize and bond in a way that honors Chase's memory and wishes. Respectfully, Brennen Neithercoat



Submitted By
Debra Nelson
Submitted On
3/4/2021 7:44:49 PM
Affiliation

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Transfer the tag to Chase Bowerson's family. It is the right thing to do.



Submitted By
Alyssia Phillips
Submitted On
3/4/2021 5:30:46 PM
Affiliation

Please consider transferring Chase Bowerson's tag to his family. If the tag was legally paid for it should still be honored. Even if transferred to his estates legal representative.



Submitted By
Aud Pleas
Submitted On
3/4/2021 11:14:51 AM
Affiliation

Chase Bowerson is not alive to claim his tag to take his first moose. I find it ridiculous that his tag cannot be transferred to a family member who also put in a request for a tag this year too. I believe it would be in the best interest for the organization to research ways to transfer tags in response to acts of God to an eligible family member especially when they followed all instructions applying for a tag independently before someone's untimely passing.



Submitted By
Joyce Salter
Submitted On
3/4/2021 6:13:04 PM
Affiliation

Please take another look at your policy of not allowing a hunting tag to be transferred to a proxy in cases of death or disability. This policy serves no true purpose and is causing actual grief to a mans family. Honor his memory. Thank you for listening



Submitted By
Ashley Schmitz
Submitted On
3/4/2021 5:49:12 PM
Affiliation

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To Whom It May Concern,

My name is Ashley Schmitz and I am writing to respectfully request a reevaluation of what is clearly a grievous error by the Alaska Department of Fish and Game. I was born and raised in Alaska, and while on paper I am no longer an Alaskan resident, it will forever be my home. One of the best parts of being raised in Alaska was my huge family, mainly consisting of so many cousins it was pointless to even attempt a headcount. One of those cousins was Chase Bowerson, who was senselessly murdered on January 2nd of this year. I don't have the right words to make sense of what happened to Chase, I doubt they even exist, but what I can offer his family and the ADFG is my voice in support of what should be their right to have Chase's hunting tag, drawn not 6 weeks after that tragic day, transferred to them so they can honor and grieve him in such a profound way. I truly hope the right thing is done in this situation, both for my family and future families going through the unimaginable.



Submitted By
Ryane Schrank
Submitted On
3/4/2021 10:41:52 PM
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On behalf of the Bowerson family, and the loss of Chase Bowerson earlier this year, I would like to request that adjustments to the rules for distributing hunting tags be modified. In exceptional circumstances, such as death or a medical occurrence that prevents someone who wins a hunting tag to accept it, passing the tag onto a family member who has also applied for, yet not received a tag for the season makes sense. People and families rely on the meat they obtain to sustain them throughout the winter. Additionally, and I'm sure you would agree, if a loved one passes and happens to receive a tag after their death, a family member receiving the tag in their place would have the opportunity to honor their loved one and follow through with something the loved one would have enjoyed. Please consider this. In particular, please consider allowing a member of the Bowerson family to receive Chase's tag that he would have so loved to receive himself. It is one thing they can do to unite as a family and make Chase proud. Thank you



Submitted By
Leslie
Submitted On
3/4/2021 7:59:02 PM
Affiliation

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Please consider changing regulations for hunt tags to be transferable to a family member in the case of the tag holder's death. This seems like an added insensitivity to a grieving family that they shouldn't have to bear.



Submitted By
Melody Smith
Submitted On
3/4/2021 5:13:33 PM
Affiliation

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This is regarding the permit for Chase Bowerson and transferring it to a family member. As Alaskan we do many things out side the box's. We make special events happen for children with cancer before they die and now this family is asking for something after. It doesn't affect anything but making a exception for them to go hunting in his honor. So, please I'm asking if it was your son and it was something that you wanted that you could spend a special day that was planned before he was murdered! Thank you for you time!

Melody Smith



Submitted By
Aaron T. Trent
Submitted On
3/5/2021 11:04:35 AM
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To whom who has the power to bring a little bit of justice to my grieving family - On December 14th 2020 I sat down with my baby brother Chase Miller Bowerson to put in for 6 moose hunts on the ADFG website. Not knowing this would be the last birthday I would spend with my brother we were unbelievably excited for the stars had finally aligned and we where both able to put in for tags together . It was the day before the deadline, it was Chases last birthday. I offered to pay for the tag fees and Chase was so excited about finally going to get to go hunting with my dad and I that he happily declined and pulled his own debit card out and payed ADFG roughly 35\$ for the 6 cow tags and a bison tag. I knew deep in my heart he was going to draw a tag, but had no idea he was going to be senselessly taken from my family two weeks later on January 2nd 2021. The longest month of my families lives later Chase drew the DM408 moose tag. Reading the results on an airplane had this grown man in full tears in front of 30 strangers. This hunt meant the world to me and my family. That is Chases Tag, I saw him purchase and win it, and my friends, family, and community will not stand for anything less than the transfer of that tag to our family. It would mean the world to my family and I am gaining confidence this small amount of justice will be served. Thank you for reading and your understanding. -Aaron Trent



Submitted By
Jeff and Kelly Trent
Submitted On
3/3/2021 12:42:10 PM
Affiliation

We are writing as executor of our son Chase Bowerson's estate, and as a voice for our son. Our son Chase was murdered on 1/2/2021, the worst day of our families lives. Chase had accomplished so much in his 26 years and had so many things he still wanted to achieve and accomplish. One of those was to go hunting this fall with his brothers and father. My husband and 3 sons put in for the draw for a chance to receive a tag, Chase put in on the last day, his birthday, because he thought it might give him some luck. Within 3 weeks of his birthday Chase was murdered. When the draw tag names were released our family felt again another loss as we saw Chase was the only member of our family to be issued a tag. We called Fish and Game to be informed they would not transfer his tag to his brothers or father and that was that. To say we felt like we were kicked yet again while down would be an understatement. Chase dreamt of going on this hunt and had big plans of the season to come. He paid for the chance to get a tag and then was awarded that chance. The chance became his property. As executor of his estate we have had to deal with paying all his debt and also taking care of his assets. This tag is his property as well and should be transferred to his brothers or father to hunt in his honor. It's not even a guarantee of a moose, but a chance. To deny it is terrible and needs to be changed. As Chase Bowerson's family we would like to petition to have the tag transferred to us, we are all lifelong Alaskans and put in for draw tags every year. If that isn't possible we would like to see this rule changed with Fish and Game so another family never has to go through this. We appreciate your time in addressing this and hope you will help us make the changes needed and possibly help us get the tag transferred so we can honor our son.

Thank you for your time and consideration -

Jeff and Kelly Trent

11410 Via Appia

Anchorage, Ak. 99515

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Submitted By
Christine vanvliet
Submitted On
3/4/2021 8:16:55 AM
Affiliation

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The proxy rule of not transferring a tag needs changing. My nephew drew a tag, he was killed, the tag should stay in family, to feed his family! To finally get a tag and have hopes of sharing and feeding a lot of people, only to 1) have your family member stolen from you then 2) have their tag not going to another family member, is a travesty!!!
This rule needs and HAS TO CHANGE!!!!!!!!!!
JUSTICE FOR CHASE!!!!!!!!!!