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Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526

**SPRING 2009 BOARD OF GAME WRITTEN COMMENTS**

Dear Alaska Board of Game Members,

**Please find the following comments for your consideration regarding proposals you will be addressing at your Spring 2009 meeting in Anchorage. The Alaska Professional Hunters Association Inc. (APHA) has serious concerns with the scope of many of the proposals you will be addressing at this meeting. The professional guide industry represents a significant and important rural economy in Alaska which is dependant upon prudent stewardship and conservation of Alaska's wildlife. Most importantly, wildlife conservation measures that support harvestable surpluses of wildlife also contribute the most enhanced lifespan and care for all species and all persons who enjoy and depend on Alaska's wildlife.**

As a State, Alaska has begun the long recovery of rebuilding and re-establishing our stewardship mandates regarding our precious wildlife populations. This momentum has been achieved primarily because of a number of like-minded conservation organizations involved with public policy making, helping to establish the tools to help you respond to biological concerns. APHA has been a significant part of this effort. Please know that your programs are working and are generating the much needed relief and better stewardship for Alaska's wildlife.

APHA has also been at the forefront of professional guide industry advocacy working to reduce negative social and wildlife/wildland conservation impacts generated by the guiding industry. During the past four years we have achieved substantial goals to this affect with the establishment (Dec. 2005) of the Big Game Commercial Services Board (BGCSB) and Development of the proposed Department of Natural Resources/ADF&G/BGCSB Guide Concession Program. This program scheduled to be implemented during January of 2011 will substantially reduce the number of guides operating on State lands.

**APHA feels that it is very important that you consider the whole of the achievements that have been made and what the benefits have been to our wildlife in these regions as well as what we can do to assist with these type of efforts in other needed regions. It is important to**

**note that there have been numerous dynamics that have been implemented on this *road to recovery* so to speak regarding our wildlife conservation enhancement and Intensive/Predator Management programs.**

**What we do know is that these dynamics are working and have stood the test of legal challenge and public acceptance. APHA therefore urges caution to you regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.**

**As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.**

**APHA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances. We urge your support for these initiatives where and when possible in keeping with maintaining the whole of the programs statewide. The predator management programs provide for optimum sustained yield management which provides for the best interest of the wildlife, and all people who depend on and enjoy prudent management.**

**Many of the proposals you will be considering at this meeting seek to eliminate or restrict existing non-resident hunter opportunity in some manner. Once again, there are numerous reasons for APHA to urge caution and restraint in regards to support of these proposals related to balance for the whole considerations.**

**Please consider the following factors when addressing these proposals:**

- 1. Annual Non-Resident Harvest percentage of moose, caribou and sheep is low in comparison with the wildlife conservation funding they provide. When you eliminate non-resident opportunity, you eliminate the vital funding needed to enhance and conserve wildlife for the best interest of the whole.**
- 2. Several of these proposals express concern over perceived crowding of guided hunting activity on public lands. Please understand that eliminating non-resident hunting activity will not eliminate transporter or other hunting parties all vying for declining wildlife populations. By eliminating non-resident hunters, or by giving special season dates for resident-only hunters we further fragment the hunter/conservationist fraternities. The perceived conflicts will not disappear from the field, rather they will continue to be replaced and possibly escalated within different user groups.**
- 3. Few if any of these proposals are generated from concerns related to Federal lands where guide industry *concessions* are incorporated which limit the number of guides per geographical region. Currently, the proposed DNR/ADF&G/BGCSB Guide**

Concession program development is in its third year of development. Proposed implementation date for the program is January 2011. Tremendous work by numerous State agencies including the Board of Game has been put into development of this program which is designed to restrict guided hunting activity on State lands. Selection criteria for this competitive program includes substantial credit given for the applicants proposed consideration for resident hunters and other user groups encountered within their plan of operations.

4. When non-resident hunting is eliminated, a substantial part of the annual predator harvest which occurs during the ungulate hunts is also eliminated. When you eliminate this non-resident harvest, you eliminate in most cases, the most significant annual predator harvest as well.
5. Moose harvest restrictions of 50 inch or certain brow tine requirement for moose hunters is biologically designed to not affect the reproduction of the moose population. Thus, the limited amount of current non-resident harvest is not affecting the overall moose population.
6. Historical predator (wolf) management was utilized to enhance ungulate populations. These historic and current efforts were and are conducted in many cases by professional guide service providers. The resulting gain in ungulate populations has now been calculated into the Amount Necessary for Subsistence numbers which is utilized to eliminate the guide service providers who have and are working so hard to assist in ungulate enhancement. In short: Many ANS numbers have been generated during the highest density of these ungulate species in history and represent numbers that we may never see again, and as such, are unjust and result in a tool utilized to eliminate other user groups.

**PROPOSALS THAT APHA OPPOSES: 14, 15, 16, 19, 34, 42, 43, 44, 45, 46, 47, 49, 50, 51, 52, 57, 59, 60, 61, 64, 67, 74, 75, 77, 78, 106, 107, 108, 109, 112, 113, 158, 162, 166, 170, 171, 174, 182, 184, 186, 189, 199, 203, 206, 210, 211, 212, 213, 214, 217, 218, 221, 224, 237,**

**PROPOSALS THAT APHA SUPPORTS: 4, 13, 29, 30, 31, 32, 33, 35, 38, 48, 53, 54, 56, 58, 65, 66, 68, 69, 76, 79, 80, 97, 101, 102, 103, 104, 105, 111, 114, 142, 143, 153, 154, 155, 160, 161, 163, 169, 173, 190, 198, 200, 201, 207, 208, 215, 219, 220, 236, 241, 244, 245, 246**

**PROPOSALS THAT APHA SUPPORTS WITH AMMENDMENT: 17, 55, 62, 129, 130, 132, 135, 136, 137, 138, 139, 140, 159**

**PROPOSALS THAT APHA HAS COMMENTS ON BUT DEFERS TO THE CONSIDERATION OF THE BOARD: 125, 127, 128, 168, 192, 216, 230, 238, 239, 240,**

## PROPOSAL COMMENTS

**Proposal 4: Support.** Based on its given merits.

**Proposal 13: Support.** Based on its given merits. This proposal addresses a geographical region that was established prior to the BOG policy regarding implementation of drawing permit hunts and non-resident hunters. This proposal represents a needed oversight.

**Proposals 14, 15, 16, 19, Oppose.** (Please see item numbers 1-4 pages 2 & 3 above.) The BOG policy regarding drawing permits allows the board to address this concern. For consideration, APHA recommends that the board may separate non-resident guided activity from second degree of kinship. APHA feels strongly that second degree of kinship permits should be awarded from the resident pool.

**Proposal 17: Support with Amendment.** APHA recommends comparing this proposal with BOG drawing permit policy regarding non-resident hunter percentages and adopting it accordingly.

**Proposal 29: Support.** Based on its given merits.

**Proposal 30: Support.** Based on its given merits. APHA members that operate in this region have experienced substantial increase in hunting pressure and decline in overall bear numbers.

**Proposal 31: Support.** Based on its given merits.

**Proposal 32, 33: Support.** Based on its given merits.

**Proposal 34: Opposes.** Prefer status quo for biological concerns.

**Proposal 35: Support.** Based on its given merits.

**Proposal 38: Support.** Based on its given merits.

**Proposal 42: Oppose.** There are ample opportunities for viewers from May 25<sup>th</sup> all through the summer months when fish runs are at their peak. Additionally Katmai National Park presents substantial and world class viewing opportunities where no hunting is allowed.

**Proposal 43: Oppose.** There is no biological justification. There are ample opportunities during times when hunting seasons are closed for viewing.

**Proposal 44: Oppose.** There is no biological justification to restrict or limit non-resident harvest.

**Proposal 45: Oppose.** This proposal suggests that the brown bear populations in the Preserve are being over hunted, this is simply not true. The current level of harvest is biologically sustainable.

**Proposal 46: Oppose.** Since the elimination of same day airborne hunting in 1972, brown bear population on the Alaska Peninsula has been managed conservatively. Shortened seasons and alternating seasons have resulted in healthy bear populations with an abundance of older age class bears available for residents and non-residents. We have avoided a permit drawing scenario in GMU 9 because of the current regulatory scheme. Brown bears are a low reproductive species. Brown bear population may be currently at high levels but it could take only one or two cycles to reduce key components of the bear population to a level where much more restrictive regulations would be required to provide for sustained yield and quality of hunting experience.

**Proposal 47: Oppose.** There is ample opportunity to harvest bears under current seasons and bag limits for any general resident whether domiciled in GMU 9 or elsewhere. There is absolutely no evidence to support the contention that there is an “*over population*” of brown bears in GMU 9E.

**Proposal 48: Support.** Based on its given merits.

**Proposal 49: Oppose.** ADF&G biological survey data will indicate that moose populations are not depleted. Bears are a very low reproductive species as opposed to wolves which are a high reproductive species.

**Proposal 50: Oppose.** Wolves are more significant factor in predation on moose and caribou than brown bears. When we had active wolf control programs, bear predation did not prove to be a significant factor. Brown bears must be managed carefully as they are a low reproductive species. Their value to all user groups are more important than relegating them to vermin status.

**Proposal 51: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandate. Nothing in current state regulation contravenes or violates the congressional intent provided in ANILCA (36 CFR 13.40(d) Bear populations are healthy and viable, harvest levels are sustainable. If there were a problem with current regulations allowing for over harvest there would not be the abundance of bears inside and outside Katmai National Park as currently exists. The preserves were specifically created by Congress to allow for hunting opportunities, not to exclude them.

**Proposal 52: Oppose.** The maker of the proposal suggests that there is an over abundance of brown bears in GMU 17, there is no evidence statistically that this is the case, additionally he suggests that moose population in the area “*will eventually drop due to bear predation*” there is also no evidence to indicate that moose populations have or will drop due to brown bear predation.

**Proposal 53: Support.** Based on its given merits.

**Proposal 54: Support.** Based on its given merits.

**Proposal 55: Support with Amendment.** Proposed amendment to include provision for non-resident allocation.

**Proposal 56: Support.** Based on its given merits.

**Proposal 57: Oppose.** (Please see comments 1, 2, 3, 4, & 6 above)

**Proposal 58: Support.** Based on its given merit.

**Proposal 59: Oppose.** There is no biological support or reason for this proposal. This proposal furthers the divide between hunter/conservationists.

**Proposal 60: Oppose.** We have biological concerns over the proposal as drafted. There appears to be ample opportunity during existing seasons to harvest moose.

**Proposal 61: Oppose.** The non-resident restrictions placed on this region were generated because of overcrowding of guides and biological concerns. APHA recommends holding back on any changes to *status quo* until implementation of the proposed DNR Guide Concession Program.

**Proposal 62: Support with Amendment.** Registration harvest levels **MUST** be monitored carefully and in a timely manner. For any future ANS determinations, unreported harvest should not be considered. The opportunity to harvest moose to meet local needs is a privilege too great to ignore licensing and reporting requirements.

**Proposal 64: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposals 65, 68, 69: Support.** APHA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances. We urge your support for these initiatives where and when possible in keeping with maintaining the whole of the programs statewide. The predator management programs provide for optimum sustained yield management which provides for the best interest of the wildlife, and all people who depend on and enjoy prudent management. APHA does not believe that State law requires for complete elimination of non-resident hunter opportunity prior to implementation of predator management programs. We encourage your consideration in this regard whenever working to implement needed predator-prey management.

**Proposal 66: Support.** Based on its given merits.

**Proposal 67: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposals 74, 75: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.

**Proposal 76: Support.** Based on its given merit.

**Proposal 77, 78: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposal 79: Support.** Based on its given merit.

**Proposal 80: Support.** Based on its given merit

**Proposals 97, 101, 102, 103: Support.** Based on their given merit

**Proposals 104, 105: Support.** Based on their given merits.

**Proposal 106, 107: Oppose.** APHA does not like to define different classes of hunters or different season dates accordingly.

**Proposal 108, 109: Oppose.** APHA recommends holding back on any changes to status quo until implementation of the proposed DNR Guide Concession Program. If any changes are considered, they should be made according to the BOG non-resident drawing permit policy.

**Proposal 111: Support.** Based on its given merits.

**Proposal 112: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposal 113: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposal 114: Support.** Based on its given merits.

**Proposals 125, 127, 128: Defers To The Consideration Of The Board** APHA has concerns over illegal importation of black bear hides from GMU 6 and for lengthening of season dates into periods of high tourism. APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.

**Proposals 129, 130, 132, 135, 136, 137, 138, 139, 140: Support with Amendment.** Based on their given merits to include non-resident allocation provision.

**Proposal 142: Support.** Based on its given merits.

**Proposal 143: Support.** Based on its given merits and to incorporate the BOG DRAWING PERMIT POLICY for non-residents.

**Proposals 153, 154: Support.** Based on their given merits. APHA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances. We urge your support for these initiatives where and when possible in keeping with maintaining the whole of the programs statewide. The predator management programs provide for optimum sustained yield management which provides for the best interest of the wildlife, and all people who depend on and enjoy prudent management. APHA does not believe that State law requires for complete elimination of non-resident hunter opportunity prior to implementation of predator management programs. We encourage your consideration in this regard whenever working to implement needed predator-prey management.

**Proposal 155: Support.** Based on its given merits and to incorporate the BOG DRAWING PERMIT POLICY for non-residents.

**Proposal 158: Oppose.** The Kodiak Island sealing condition was initiated years ago to keep bears from Kodiak Island on the Island instead of showing up in Bristol Bay or Anchorage for sealing. While this has proved to be cumbersome at times, the system has worked well and APHA would not like to see it changed, as we believe a change could impact bear populations on Kodiak Island in a negative way.

**Proposal 159: Support with amendment.** Delete same day airborne portion of the proposal.

**Proposal 160: Support.** Based on its given merits.

**Proposal 161: Support.** Based on its given merits.

**Proposal 162: Oppose.** APHA does not like to define different classes of hunters or different season dates accordingly.

**Proposal 163: Support.** Based on its given merits.

**Proposal 166: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.

**Proposal 168: Defers To The Consideration Of The Board** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.

**Proposal 169: Support.** Based on its given merit.

**Proposals 170, 171: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs. As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

**Proposal 173: Support.** Based on its given merits.

**Proposal 174: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandates.

**Proposal 182: Oppose.** APHA does not like to define different classes of hunters, different season dates or means and methods of harvest, accordingly.

**Proposal 184: Oppose.** Please refer to BOG policy regarding non-resident drawing permits.

**Proposal 186: Oppose.** Based on the best interests of the wildlife in this region and our State management for abundance mandate.

**Proposal 189: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs. As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

**Proposal 190: Support.** Based on its given merits.

**Proposal 192: Defers To The Consideration Of The Board.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs. As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

**Proposal 198: Support.** Based on its given merit.

**Proposal 199: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs, especially when season dates encroach into high tourism time periods.

**Proposal 200: Support.** Based on its given merit.

**Proposal 201: Support.** Based on its given merit.

**Proposal 203: Oppose.** Please refer to comments 1,2, 3, and 4 on pages 2 and 3 above. If any separate allocation is considered the BOG Policy regarding development of drawing permits should be considered.

**Proposal 206: Oppose.** APHA opposes providing different season dates, or means and methods of harvest for specialty weapon hunts. Prefer status quo, which is fair to all hunters.

**Proposal 207: Support.** Based on its given merits.

**Proposal 208: Support.** Based on its given merits

**Proposals 210, 211: Oppose.** APHA opposes providing different season dates, or means and methods of harvest for specialty weapon hunts. Prefer status quo, which is fair to all hunters.

**Proposals 212, 213, 214: Oppose.** APHA has been at the forefront of professional guide industry advocacy working to reduce negative social and wildlife/wildland conservation impacts generated by the guiding industry. During the past four years we have achieved substantial goals to this effect with the establishment (Dec. 2005) of the Big Game Commercial Services Board (BGCSB) and Development of the proposed Department of Natural Resources/ADF&G/BGCSB Guide Concession Program. This program scheduled to be implemented during January of 2011 will substantially reduce the number of guides operating on State lands. Tremendous work by numerous State agencies including the Board of Game has been put into development of this program, which is designed to restrict guided hunting activity on State lands. Selection criteria for this competitive program includes substantial credit given for the applicants proposed consideration for resident hunters and other user groups encountered within their plan of operations.

Please understand that eliminating non-resident hunting activity will not eliminate transporter or other hunting parties all vying for declining wildlife populations. By eliminating non-resident hunters, or by giving special season dates for resident only hunters we further fragment the hunter/conservationist fraternities. The perceived conflicts will not disappear from the field, rather they will continue to be replaced and possibly escalated within different user groups.

Annual Non-Resident Harvest percentage of moose, caribou and sheep is low in comparison with the wildlife conservation funding they provide. When you eliminate non-resident opportunity, you eliminate the vital funding needed to enhance and conserve wildlife for the best interest of the whole.

When non-resident hunting is eliminated, a substantial part of the annual predator harvest which occurs during the ungulate hunts is also eliminated. When you eliminate this non-resident harvest, you eliminate in most cases, the most significant annual predator harvest as well.

**Proposal 215: Support.** Based on its given merits.

**Proposal 216: Defer To The Consideration Of The Board.** APHA requests that the BOG encourage the Department to create a working group of all users to work on complex wild sheep related issues.

**Proposal 217: Oppose.** APHA strongly supports the many merits of the existing sealing requirement.

**Proposal 218: Oppose.** APHA has been at the forefront of professional guide industry advocacy working to reduce negative social and wildlife/wildland conservation impacts generated by the guiding industry. During the past four years we have achieved substantial goals to this effect with the establishment (Dec. 2005) of the Big Game Commercial Services Board (BGCSB) and Development of the proposed Department of Natural Resources/ADF&G/BGCSB Guide Concession Program. This program scheduled to be implemented during January of 2011 will substantially reduce the number of guides operating on State lands. Tremendous work by numerous State agencies including the Board of Game has been put into development of this program which is designed to restrict guided hunting activity on State lands. Selection criteria for this competitive program includes substantial credit given for the applicants proposed consideration for resident hunters and other user groups encountered within their plan of operations.

Please understand that eliminating non-resident hunting activity will not eliminate transporter or other hunting parties all vying for declining wildlife populations. By eliminating non-resident hunters, or by giving special season dates for resident only hunters we further fragment the hunter/conservationist fraternities. The perceived conflicts will not disappear from the field, rather they will continue to be replaced and possibly escalated within different user groups.

Annual Non-Resident Harvest percentage of moose, caribou and sheep is low in comparison with the wildlife conservation funding they provide. When you eliminate non-resident opportunity, you eliminate the vital funding needed to enhance and conserve wildlife for the best interest of the whole.

When non-resident hunting is eliminated, a substantial part of the annual predator harvest which occurs during the ungulate hunts is also eliminated. When you eliminate this non-resident harvest, you eliminate in most cases, the most significant annual predator harvest as well.

**Proposal 219: Support.** Based on its given merits.

**Proposal 220: Support.** Based on its given merits. APHA encourages the board to adopt this proposal which will directly address substantial ongoing illegal guiding activity by transporters.

**Proposal 221: Oppose.** Prefer status quo.

**Proposal 224: Oppose.** APHA supports the concept of this proposal regarding white color phase of black bears but the proposal is not definitive enough to protect white phased bears versus other light colored phases of black bears.

**Proposal 230: Defer To The Consideration Of The Board.** Historical predator (wolf) management was utilized to enhance ungulate populations. These historic and current efforts were and are conducted in many cases by professional guide service providers. The resulting

gain in ungulate populations is now calculated into the Amount Necessary for Subsistence numbers which is utilized to eliminate the guide service providers who have and are working so hard to assist in ungulate enhancement. In short: The ANS numbers generated during the highest density of these ungulate species in history and represent numbers that we may never see again, and as such, are unjust and result in a tool utilized to eliminate other user groups.

**Proposal 236: Support.** Based on its given merits.

**Proposal 237: Oppose.** APHA urges caution regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs. As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs. We support the working group establishment portion of this proposal.

**Proposal 238, 239: Defer To The Consideration Of The Board.** Please see page one of these comments.

**Proposal 240: Defer To The Consideration Of The Board.** APHA has studied this concept extensively and found that it has limited merit.

**Proposal 241: Support.** Based on its given merits

**Proposal 244: Support.** Based on its given merits.

**Proposal 245: Support.** Based on its given merit.

**Proposal 246: Support.** Based on its given merit.

Thank you for your consideration of these comments.  
Submitted By:

Robert Fithian  
Executive Director  
Alaska Professional Hunters Association, Inc.