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Cc: [Grediagin, Lisa M](#)
Subject: Fw: [EXTERNAL] Comment on unit 7 Trapping
Date: Monday, June 30, 2025 10:02:28 AM

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From: Laurie Radzinski <l.radzinski@gmail.com>
Sent: Sunday, June 29, 2025 6:07 PM
To: Subsistence, OSM <subsistence@ios.doi.gov>
Subject: [EXTERNAL] Comment on unit 7 Trapping

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I urge you to support trapping setback regulations as outlined in the following letter.
Thank you,
Laurie Radzinski
Cooper Landing

Organization: Cooper Landing Safe Trails Committee Address:
Address: PO Box 652, Cooper Landing, AK 99572
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1: What Regulation do you wish to change?
SUMMIT LAKE AREA

There are no current federal subsistence regulations regarding trap placement in unit 7 on the Kenai Peninsula; this would be a new proposal. This refers to the Summit Lake Recreation Area.

2: How would the new regulation read?

Add the Following Language to Trapping Regulations For Unit 7.

"Trap setback of 100-yards along the perimeter of highway pullouts accessing backcountry areas along the Seward Highway, and on both sides of the winter trail know locally as 'Japan Woods' which is the west side of the Seward Highway from the southern-most tip of Summit Lake (MP 44.5) to south of Colorado Creek (MP 46.25) in the Summit Lake Recreational Area. Traps with an inside spread of 5 inches or less which are set at least 4 feet above the ground or snow level, leghold size 1% or smaller traps, and size 110 and 120 conibear traps in boxes are allowed."

3: Why should this regulation change be made?

• Search and rescue dog owners have voiced concern about using their dogs in the case of an emergency due to the danger of traps. This puts human life in jeopardy due to lack of regulations.

- It aligns with USFS Mission for management of USFS lands to include the management for multiple uses using a balanced approach. Their **"Our Values"** statement cites, managing for **"Safety. In every way: physical, psychological, and social"**

- Impacts would be negligible to subsistence trappers as they could continue to trap under State regulations in these regions. That said, it is hoped that federal subsistence users would comply with the new regulation. If the regulation is adopted by the Federal Subsistence Program, we hope that a proposal submitted to the BOG in the future would eventually gain support for passage by recognizing:

- o 1) the requests of non-consumptive users when evaluating trapping regulations in this small region of the state

"Trap setback of 100-yards along the perimeter of highway pullouts accessing backcountry areas along the Seward Highway, and on both sides of the winter trail know locally as 'Japan Woods' which is which is the west side of the Seward Highway from the southern-most tip of Summit Lake (MP 44.5) to south of Colorado Creek (MP 46.25) in the Summit Lake Recreational Area. Traps with an inside spread of 5 inches or less which are set at least 4 feet above the ground or snow level, size 3 leg-hold marten traps in boxes or smaller traps, and size 110 and 120 conibear traps in boxes are allowed."

Summit Lake Recreational Area o 2) the mission of the USFS to manage for balanced recreational uses and recognizing their can be a balanced approach to reduce conflict and

- o 3) the willingness of the Federal Subsistence Program to make regulatory changes that do not significantly interfere with the subsistence opportunity to trap and yet reduce long term user conflicts occurring in a high density multi recreational use region of the State.

- o 4) a balanced approach will reduce conflict

- Local residents are supportive of a more balanced approach to management of recreational uses as indicated by a local survey by the Cooper Landing Community Safe Trails Committee.

- According to ADF&G data, 99.6% of Alaskans don't trap and only .4% do. Land use management should adjust to this current usage.

- Incidents of abandoned or "ghost traps" near the areas described will be decreased for the off-trapping seasonal activities. Such leftover active traps have been found at the Russian Falls Trailhead and on Williams Beach.

4: What impact will this change have on wildlife populations?

This change will have no effect on wildlife populations.

5: How will this change affect subsistence uses?

This change will likely have minimal or no effect on federal subsistence trapping harvest as it will restrict trapping on a very small portion of USFS federal lands in Unit

7. Subsistence trappers will be required to set traps at least 100 yards from the specified locations mentioned in the regulation. The mandatory 100 yard setback may result in increased time and effort to set traps within these zones as trappers would be required to set traps 100 yards away from designated trails; that translates to 120 steps or a few minutes snow machine ride.

Traps set by federal subsistence users that are 100 yards from specified trails may result in:

- 1) reduced risk of traps being physically disturbed by other recreational users,
- 2) possible increased harvest due to less disturbance (noise, scents, movements) by recreationist activities, given they are further from trails, and
- 3) reduced potential trapping of non-target species like dogs, etc.

This restriction will be more restrictive than State regulations however, adoption of this proposal by the Federal Subsistence Board would be an initial step forward towards providing for more balanced recreational opportunities, and subsequently reducing user conflicts, within a small but significant region of the State that experiences higher density concentrated recreational uses. 6: How will this change affect other uses, such as sport/recreational and commercial?

It will effect a safer and more accessible usage of the land that is meant for all user groups, especially for search and rescue. The goal of submitting this proposal is to find a solution to a growing conflict between recreation users and subsistence trappers in a manner that minimizes disruption to subsistence

trapping. In accordance with its mission statement, The US Forest Service (USFS) is required to manage its lands; to balance the short and long term needs of people and nature by:

- Working in collaboration with the communities and our partners;
- Providing access to resources and experiences that promote economic, ecological, and social vitality; and
- Connecting people to the land and one another

This issue has a long history locally and is experiencing increased interest as the nature of our community changes. Cooper Landing is experiencing a shift to younger general age population which lends itself to more family winter outdoor adventures. Cooper Landing is also becoming a year-round destination for all-season activities evidenced by the number of cars at the trailheads in the Summit Lake Area, new year-round businesses like the Brewery, the anticipated Three Bears store and vacation rentals. The bypass being constructed for Cooper Landing will bring more visitors and plans for more housing and recreation developments is on the table.

The area listed was considered by the amount of winter usage it receives. This is documented by the amount of ski, bike, snowmachine and foot tracks; cars parked at the trailhead, postings on the Cooper Landing Facebook pages and community input.

There's a growing interest by the local community members to find a solution that is both compromising and positive for all users. The Cooper Landing Community Safe Trails Committee is merely a reflection of what the residents are asking for and reflecting those desires. A 2021 survey sent to every landowner, post office box holder and many businesses in Cooper Landing (total 420) had a 35% return rate. The results were overwhelmingly supportive of creating trap

setbacks close to highly used public areas. An average of **90%** with a standard deviation of ± 8 , thought that it is necessary and appropriate to have areas where families can ski, skijor, hike, snowshoe, snowmachine and enjoy winter recreation safe from the possibility of dogs or humans getting injured by a trap. This is a 7% increase from a survey done in 2015 of supporters. There were many comments on the survey that indicated a half mile or mile setback would be better; we thought that excessive and are more interested in protecting core areas near trails that have a more concentrated public use.

With respect to the Federal Subsistence trappers, our goal was to limit our request to only areas highly used by the public, realizing there is still a vast backcountry for trappers to use. Several responses from local trappers indicated support for this regulation change. It was a trapper who suggested the 100-yard setback for traps on the Homer trails.

A difficult-to-measure yet vital aspect of the current situation is the emotional stress and fear associated with the threat of traps close to trails/beaches/roads. As indicated via local meetings and the survey, people do not go to their favorite places with their dogs for fear of a trap encounter. Signage would alleviate this, which is another proposal submitted.

Another group affected is the bird hunters with bird dogs; these dogs are typically well-behaved and under strict voice command, yet there was a fatality on a highway pullout up north where an irresponsible trapper placed a trap 50 feet from the road.

User groups and land uses are expanding and changing, and the need to change these regulations is long overdue. There is a significant difference in the number of recreational users compared to trappers, with 99.6% being recreational users and 0.4% being trappers. Despite this, public lands are predominantly utilized by subsistence users. A balance of uses on public lands is required by the USFS and by ANUCA, provided that it does not significantly impact subsistence users. As it stands, the regulated use favors trappers in accessibility and allocation. Excluding a minor amount of federal lands in Game Unit 7 for use by subsistence trappers would have a minimal effect on the subsistence trapping opportunities yet would resolve ongoing conflicts with the other user groups.

A compromise between the user groups appears to be gaining support and we believe a respectful resolution is possible. The Cooper Landing Safe Trails Committee created and posted signs asking trappers to voluntarily set traps 400 yards back (1,200 feet) in 2019 -2023 around areas listed in other proposal requests. . New signs have been designed and placed at sensitive areas suggesting a 100 yard setback of traps as of Feb. 2025.

While one local trapper believes this may have had a positive impact, recreationalists believe adherence is not enough, there needs be well understood enforceable boundaries. It is only through adopted regulations that recreationists may have peace of mind and certainty about trap locations

An ANILCA section 810 analysis was completed as part of the FEIS process on the Federal Subsistence Management Program. The intent of all Federal subsistence regulations is to accord subsistence uses of fish and wildlife on public lands a priority over the taking of fish and wildlife on such lands for other purposes, unless restriction is necessary to conserve healthy fish and wildlife populations. The final section 810 analysis determination appeared in the April 6, 1992, ROD and concluded that the Federal Subsistence Management Program, under Alternative IV with an annual process for setting subsistence regulations, may have some local impacts on subsistence uses, but will not likely restrict subsistence uses significantly.

*This 100 yard setback would not affect subsistence use **significantly**; the area designated is a very small percentage of the wilderness area to trap in in Unit 7.*

ANILCA

Alaska National Interest Lands Conservation Act

Section 804

Except as otherwise provided in this Act and other Federal laws, the taking on public lands offish and wildlife for non-wasteful subsistence uses shall be accorded priority over the taking on such lands of fish and wildlife for other purposes. Whenever it is necessary to restrict the taking of populations of fish and wildlife on such lands for subsistence uses in order to protect the continued viability of such populations, or to continue such uses, such priority shall be implemented through appropriate limitations based on the application of the following criteria:

1. customary and direct dependence upon the populations as the mainstay of livelihood;
2. local residency; and
3. the availability of alternative resources.

Trapping in the areas designated in this proposal:

- *does not constitute a "mainstay of livelihood"*
- *it negatively affects local residency and*
- *there are plentiful alternative resources.*

...therefore, appropriate limitation can and should be legally applied.