



PC 401

Name: O'Brien, Tyler

Community of Residence: Wasilla, Alaska

Submission Time: 1/2/2024 5:41:40 AM

Comment:

I oppose proposal 3 to shut down all caribou hunting.

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

Proposal 3: Oppose



PC 402

Name: Oberbroeckling, James

Community of Residence: Grand Junction Colorado

Submission Time: 1/7/2024 5:38:15 PM

Comment:

I oppose proposals #3 and #38

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 403

Name: Oboczky, Jack

Community of Residence: Rootstown, Ohio

Submission Time: 1/13/2024 1:34:31 AM

Comment:

To whom this concerns, I oppose proposal 3 and 38 for a few reasons. First is the loss of hunting opportunity for the nonresident in these areas seems to be in an attempt to help control animal numbers, but may be best addressed by limiting tags allocated during a time of herd rebuilding to the nonresident, but not to remove them from the equation entirely. The preservation of the natural resource is very important and the impact we as hunters have on the landscape shouldn't go unnoticed, I may never come to Alaska to caribou hunt but if the chance were to present itself I would. Going through the correct steps work tags and licenses, spending money in the state for travel, lodging, food and a host of other amenities will only benefit the region as a whole. So I ask that you please reconsider these proposals that may in the future be the gateway to other hunting, fishing and trapping rights taken away, causing division in a lifestyle that is already under attack. Thank you for your time.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 404

Name: O'BRIEN, MIKE

Community of Residence: Springville, UT

Submission Time: 1/11/2024 6:52:54 AM

Comment:

Howl For Wildlife

Sign in

Two proposals seek to lock non-resident caribou hunters out of northwest Alaska

Proposals Would Close Non-Resident Caribou Hunting in Northwest Alaska

By: Tyler Freel - [Link to Full story on OutdoorLife here](#)

Excerpt from story below

Proposals 3 and 38: Closure for Non-Residents

As part of the regulatory process in Alaska, the Board of Game has regular meetings and considers proposals for regulation changes. Anyone can submit a proposal, which allows the public a great opportunity to participate in the wildlife management process and enact meaningful change in the hunting and trapping regulations. This also means that the BOG regularly fields a number of outlandish, crackpot proposals that would never pass muster. Regardless, each proposal is considered and a quick vote can pass it.

Proposals 3 and 38 will be debated and voted on during meetings that are scheduled for Jan. 26-29 in Kotzebue. If passed, proposal 3 would close Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A to all non-resident caribou hunters. Proposal 38 would close Unit 23 to non-resident caribou hunters. Proposals 2, 36, and 37 would reduce bag limits for resident hunters, but it's unclear whether those reductions would have any impact on the subsistence harvest on federal lands.

State regulations currently allow five caribou per day (cows or bulls) for residents, with a year-round season on bulls, and a seven-month-long season for cows. The Federal Subsistence regulations also allow five caribou per day with a year-round season for bulls, and an eight-month-long season for cows.

If approved, either of these proposals (3 and 38) would result in one of the most widespread losses of hunting opportunities for non-residents that the state has ever seen — with little evidence to support it.

[Read Full story on OutdoorLife here](#)

You'll need to submit comments and also support or oppose #3 & #38 when then you click the below link.

Based on the information in the article, here are ten talking points on why proposals #3 and #38 should be opposed:

Limited Impact of Non-Resident Hunting: Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

Subsistence Hunting Impact: The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

Precedent for Wildlife Management: The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing.

Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

Cultural and Recreational Loss: The closure would deny non-residents the cultural and recreational experience of hunting in this unique region.

Potential for Better Management Practices: Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability.

Need for Comprehensive Approach: Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 405

Name: Office of Subsistence Management

Community of Residence: Anchorage

Submission Time: 1/8/2024 11:07:14 PM

Comment:

See attached

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



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

In Reply Refer To:
OSM.24000

JAN 08 2024

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

Dear Chairman Burnett:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Game proposals during the January 26–29, 2024 Western Arctic/Western Region Meeting.

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

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

Sincerely,

Anee Howard
Acting Assistant Regional Director

Enclosure

cc: Federal Subsistence Board
Office of Subsistence Management
Interagency Staff Committee

Chairman Burnett

2

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Seward Peninsula Subsistence Regional Advisory Council

Northwest Arctic Subsistence Regional Advisory Council

North Slope Subsistence Regional Advisory Council

Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Mark Burch, Assistant Director Wildlife Division, Alaska Department of Fish and Game

Administrative Record

RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Western Arctic/Western Region Meeting

January 26—29, 2024

Kotzebue, Alaska

Office of Subsistence Management (OSM)

PROPOSAL 2 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for taking caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A to four caribou per year, only one of which may be a cow.

Current Federal Regulations:

Unit 21D—Caribou

Unit 21D, remainder— 5 caribou per day, as follows: Calves may not be taken.

Bulls may be harvested.

July 1-Oct. 14.

Feb. 1-June 30.

Cows may be harvested.

Sep. 1-Mar. 31.

Unit 22—Caribou

Unit 22B that portion west of Golovnin Bay and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River and excluding all portions of the Niukluk River drainage upstream from and including the Libby River drainage - 5 caribou per day by State registration permit. Calves may not be taken.

Oct. 1-Apr. 30.

May 1-Sep. 30, a season may be announced.

Units 22A, that portion north of the Golsovia River drainage, 22B remainder, that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E, that portion east of and including the Tin Creek drainage - 5 caribou per day by State registration permit. Calves may not be taken.

July 1–June 30.

Unit 22A, remainder - 5 caribou per day by State registration permit. Calves may not be taken

July 1-June 30, season may be announced.

Unit 22D, that portion in the Pilgrim River drainage - 5 caribou per day by State registration permit. Calves may not be taken

Oct. 1-Apr. 30.

May 1-Sep. 30, season may be announced

Units 22C, 22D remainder, 22E remainder - 5 caribou per day by State registration permit. Calves may not be taken

July 1-June 30, season may be announced

Unit 23—Caribou

Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage—5 caribou per day by State registration permit as follows:

Bulls may be harvested *July 1—June 30*

Cows may be harvested. However, cows accompanied by calves may not be taken July 15—Oct. 14. *July 15—Apr. 30*

Unit 23, remainder—5 caribou per day by State registration permit as follows:

Bulls may be harvested *July 1—June 30*

Cows may be harvested. However, cows accompanied by calves may not be taken July 31—Oct. 14. *July 31—Mar. 31*

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations.

Bureau of Land Management managed lands between the Noatak and Kobuk Rivers and Noatak National Preserve are closed to caribou hunting from Aug. 1-Sep. 30 for the 2022-24 regulatory cycle, except by federally qualified subsistence users hunting under these regulations.

Unit 24—Caribou

Unit 24B remainder - 5 caribou per day, as follows: Calves may not be taken.

Bulls may be harvested. *July 1-Oct. 14.*

Feb. 1-June 30.

Cows may be harvested.

July 15-Apr. 30.

Units 24C, 24D - 5 caribou per day, as follows: Calves may not be taken.

Bulls may be harvested.

July 1-Oct. 14.

Feb. 1-June 30.

Cows may be harvested

Sep. 1-Mar. 31.

Unit 26—Caribou

Unit 26A - that portion of the Colville River drainage upstream from the Anaktuvuk River, and drainages of the Chukchi Sea south and west of, and including the Utukok River drainage - 5 caribou per day by State registration permit as follows: Calves may not be taken

Bulls may be harvested

July 1-Oct. 14.

Dec. 6-June 30.

Cows may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15

July 16-Mar. 15.

Noatak National Preserve is closed to caribou hunting from Aug. 1-Sep. 30 for the 2022-24 regulatory cycle, except by federally qualified subsistence users hunting under these regulations.

Unit 26A remainder - 5 caribou per day by State registration permit as follows: Calves may not be taken

Bulls may be harvested

July 1-Oct. 15.

Dec. 6-June 30.

Up to 3 cows per day may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15

July 16-Mar. 15.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Four proposals affecting the Western Arctic Caribou Herd (WACH) will be considered by the Federal Subsistence Board in April 2024.

Proposal WP24-28 is the Federal counterpart to State Proposal 2. It was also submitted by the WACH working group and requests the same harvest limit reductions in the same units. Proposal WP24-29 requests a reduction in the caribou harvest limit in Unit 23 only to four caribou per year, only one of which may be a cow.

Proposals WP24-30 and WP24-31 request closing Federal public lands in Unit 23 to caribou hunting by non-federally qualified users from August 1 to October 31.

Impact to Federal subsistence users/wildlife: If this proposal is adopted, the individual caribou harvest limit throughout the range of the WACH would be reduced from five caribou per day to four caribou per year, only one of which may be a cow. The decreased harvest limits and more restrictive cow harvest would reduce hunting opportunity and harvest under State regulations. However, these regulatory changes could help conserve the WACH and aid in its recovery, which, in turn, could provide more hunting opportunity in the future. The Teshekpuk and Central Arctic caribou herds occupy portions of Unit 26A. As these herds have not experienced substantial population declines like the WACH, adopting this proposal may unnecessarily restrict harvest from these herds.

Additionally, reduced harvest limits could also impact sharing networks, which are an important cultural component for subsistence users in these areas and contribute to food security. While four caribou per year may be enough for individuals and some families (NWARAC 2022), many families and elders depend on higher harvesting households (the “super households”) to provide caribou meat (Wolfe et al. 2007).

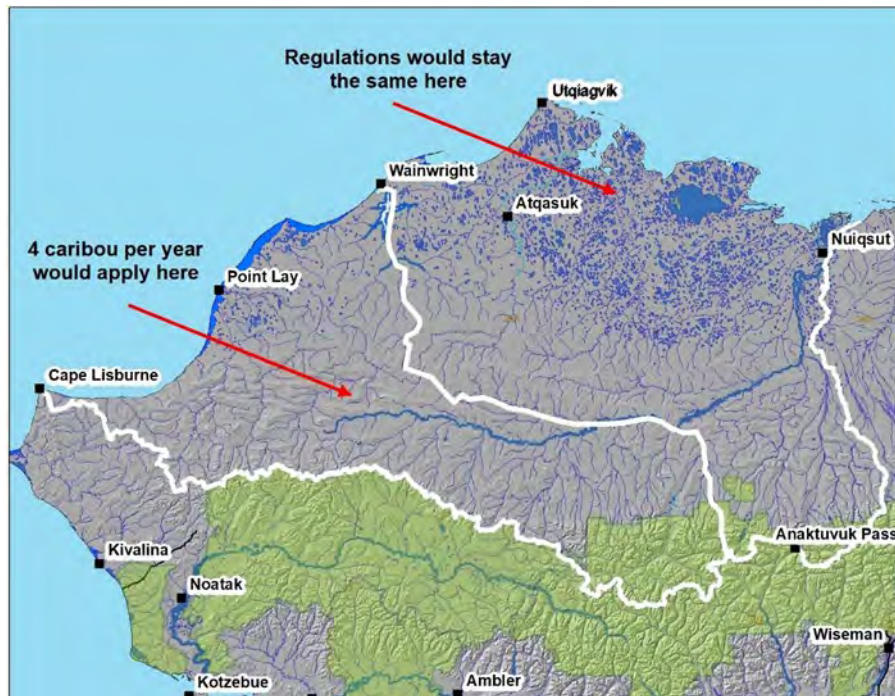
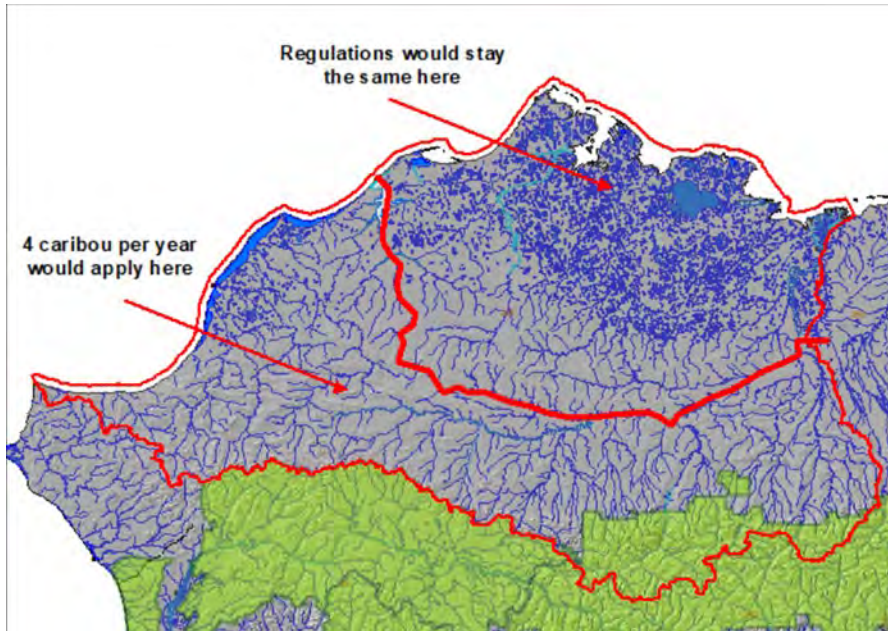
Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 2 **with modification** to exclude the eastern portion of Unit 26A from the harvest limit reductions (**Map 1**).

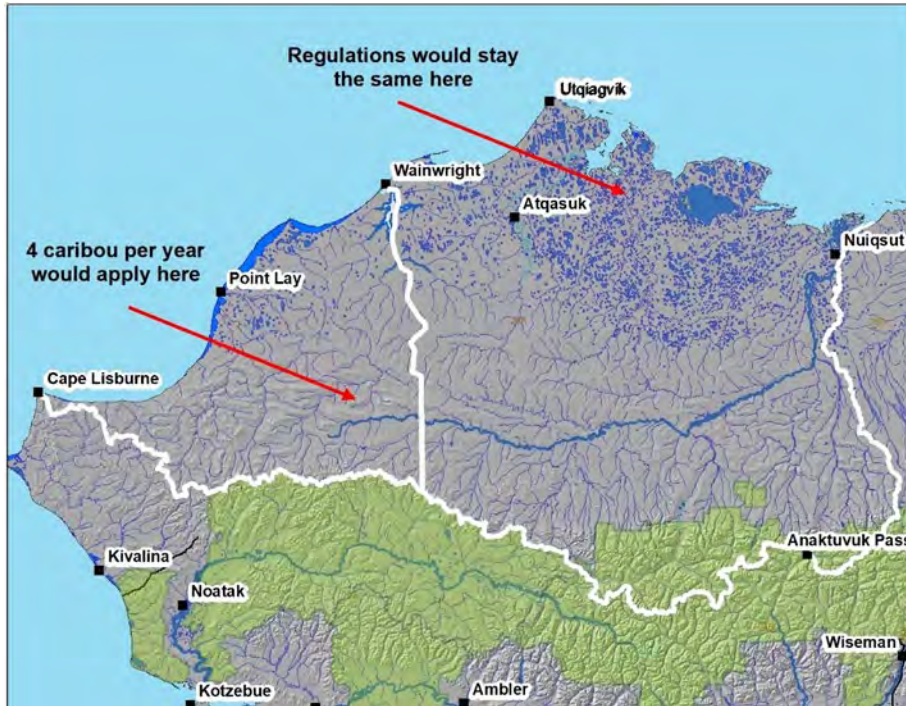
Rationale: OSM supports measures to reduce conservation concerns for the WACH. The lengthy and precipitous decline of the WACH warrants strong measures to aid in the recovery and conservation of this population. Current harvest rates, especially the taking of cows, could prolong or worsen the current decline, and hamper recovery efforts. Additionally, while causes of the decline are multi-faceted and uncertain, reducing human harvest is the most controllable factor.

However, reducing the individual harvest limit to four caribou per year throughout the range of the WACH may prevent some communities from meeting their subsistence needs. While OSM believes

harvest reduction is necessary to conserve the WACH, OSM supports conservation measures that are workable for and supported by the affected communities and subsistence users.

This proposal, as written, may also cause unnecessary hardship and restrictions for users in the portions of the WACH range that are primarily occupied by other caribou herds that are above State population objectives and are currently not of conservation concern. Therefore, OSM supports excluding the eastern portion of Unit 26A from the harvest limit reductions, although OSM is neutral on the exact boundaries. Several examples are provided below (**Map 1**).





Map 1. Examples of the eastern portion of Unit 26A to be excluded from the individual caribou harvest limit reductions.

Literature Cited

NWARAC. 2022. Transcripts of the Northwest Arctic Subsistence Regional Advisory Council proceedings, October 31 and November 1, 2022, in Kotzebue, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

Wolfe, R.J., C.L. Scott, W.E. Simeone, C.J. Utermohle, and M.C. Pete. 2007. The “Super-Household” in Alaska. Native subsistence economics. National Science Foundation, ARC 0352677. Washington DC. 31 pages.

PROPOSAL 4 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Align caribou seasons in Unit 26A and Unit 23 and reduce the bag limit.

Align caribou harvest and seasons with Unit 26A remainder to reduce cow harvest in southern Unit 26A and Unit 23 north of and including Singoalik River Drainage.

See comments for Proposal 2.

PROPOSAL 5 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for caribou for RC907 resident hunters in Units 23 and 26A and change the nonresident hunt to a registration permit with additional restrictions.

See comments for Proposal 2.

PROPOSAL 6 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Close the Mulchatna caribou herd to hunting for five to ten years in Unit 18.

Current Federal Regulations:

Unit 18—Caribou

Unit 18—that portion to the east and south of the Kuskokwim River-up to 2 caribou by State registration permit. *Season may be announced between Aug. 1 – Mar. 15*

Unit 18 remainder—up to 2 caribou by State registration permit *Season may be announced between Aug. 1 – Mar. 15*

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

Impact to Federal subsistence users/wildlife: The adoption of this proposal would minimally impact federally qualified subsistence users. Currently, there is no open season under State regulations for caribou in Unit 18, while under Federal regulations, the season is to-be-announced. However, no Federal season has been announced in recent years due to conservation concerns.

This proposal would also not impact the Mulchatna Caribou Herd since State and Federal seasons are already closed, and therefore, no legal harvest has occurred. The Mulchatna caribou count was 13,500 in 2020 down from 200,000 in 1996 (OSM 2022). The herd has remained at very low levels (12,507 in 2023), well below population objectives, and currently is unable to sustain any harvest.

However, if the herd recovers sufficiently over the next 5—10 years to allow for some harvest, the current State regulations provide the flexibility to open a season. This flexibility could benefit federally qualified subsistence users by providing harvest opportunity as soon as practicable and helping to meet subsistence needs.

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

Rationale: The State hunt is already closed to reduce and minimize harvest of Mulchatna caribou until the herd has recovered. The current regulations allow for the flexibility needed to manage the Mulchatna Caribou Herd.

Literature Cited

OSM. 2022. Staff analysis WP22-41. Pages 300-333 in Federal Subsistence Board Meeting Materials. April 15-22, 2022. Office of Subsistence Management, USFWS. Anchorage, AK. 1267.

PROPOSAL 7 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

Lengthen the resident only registration moose hunt RM617 in Unit 18 by two weeks to end October 15.

Current Federal Regulations:

Unit 18—Moose

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

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposal WP24-19 requests that the fall moose season within the Kanektok and Arolik river drainages in Unit 18 be extended from September 1–30 to September 1–October 15. While the proposal as submitted requests extending the moose season in the Kanektok and Arolik river drainages, the proponent clarified that the proposed season extension is for the entire hunt area that encompasses the community of Quinhagak. This area corresponds to the existing hunt area of “Unit 18, south of the Eek River drainage and north of the Goodnews River drainage”.

Impact to Federal subsistence users/wildlife: If this proposal is adopted, the moose season in the RM617 (Kanektok/Arolik) hunt area of Unit 18 would be extended, providing federally qualified subsistence users with an additional 15 days to harvest moose under State regulations. This would provide more opportunity, which may be especially important given the reduction in opportunities to harvest other subsistence resources. A later season could also ease meat care and reduce spoilage issues due to cooler weather.

The effects of adopting this proposal on the moose population are unknown. The additional 15 days of opportunity to harvest moose may result in a substantial increase in overall harvest and harvest success rates due to better hunting conditions. This may curtail the growth rate of this growing moose population, which has continued to increase since 2019 when Federal and State regulations were greatly liberalized.

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

Rationale: Extending the moose season provides additional opportunity for federally qualified subsistence users. There are minimal conservation concerns as this moose population has continued to increase since 2019 when Federal and State regulations were greatly liberalized.

PROPOSAL 8 – 5 AAC 85.045(16). Hunting seasons and bag limits for moose.

Extend season dates for moose hunting in hunt RM617 in Unit 18.

See comments for Proposal 7.

PROPOSAL 9 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.

Liberalize the bag limit for moose in Unit 18 remainder to 3 moose.

Current Federal Regulations:

Unit 18—Moose

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

Is a similar issue being addressed by the Federal Subsistence Board? No. However, the Federal Subsistence Board adopted Proposal WP22-42 in April 2022, which increased the Federal moose harvest limit in Unit 18 remainder to three moose.

Impact to Federal subsistence users/wildlife: If this proposal is adopted, the State harvest limit for moose in the Unit 18 remainder hunt area will increase from two to three moose, which would align State and Federal regulations, reducing regulatory complexity and confusion. The expanded harvest limit would increase opportunity for federally qualified subsistence users and might promote further sharing of moose throughout the Yukon-Kuskokwim region and support subsistence families in need.

No negative impacts are expected on the moose population, which exceeds management population objectives and is believed to exceed habitat carrying capacity. The requested increased harvest limit may slow the continued growth of this rapidly growing moose population, which would be a positive impact.

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

Rationale: The moose population in the Unit 18 remainder hunt area far exceeds management objectives and is believed to exceed the habitat carrying capacity. Increasing the harvest limit from two to three moose may help limit the growth of this moose population and will provide additional opportunity for federally qualified subsistence users.

PROPOSAL 10 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.

Liberalize the moose bag limit in Unit 18 Kuskokwim hunt area.

Current Federal Regulations:

Unit 18—Moose

Unit 18 – that portion east of a line running from the mouth of the Ishkowiik River to the closest point of Dall Lake, then to the east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (N 60°59.41' Latitude; W162°22.14' Longitude), continuing upriver along a line 1/2 mile south and east of, and paralleling a line along the southerly bank of the Johnson Sept. 1 – Oct. 15

River to the confluence of the east bank of Crooked Creek, then continuing upriver to the outlet at Arhymot Lake, then following the south bank east of the Unit 18 border and then north of and including the Eek River drainage¹—1 antlered bull by State registration permit during the fall season

or

1 antlered bull by Federal registration permit during a may-be-announced winter season *May be announced between Dec. 1–Jan. 31.*

Federal public lands are closed to the taking of moose except by residents of Tuntutuliak, Eek, Napakiak, Napaskiak, Kasigluk, Nunapitchuk, Atmanutlauk, Oscarville, Bethel, Kwethluk, Akiachak, Akiak, Tuluksak, Lower Kalskag, and Kalskag

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposal WP24-20 requests modifying the harvest limit, permit requirements, and delegation of authority letter (DAL) for moose in the Kuskokwim River hunt area of Unit 18 during the winter Federal subsistence hunting season. The modification to the harvest limit is to change it from ‘one antlered bull’ to ‘Up to one moose’. The modification to the DAL includes delegating authority to the Yukon Delta National Wildlife Refuge (NWR) manager to announce sex and antler restrictions, determine the permit allocation system, and set any needed permit conditions for the may-be-announced winter Federal subsistence moose hunting season.

Impact to Federal subsistence users/wildlife: Adopting this proposal would allow for harvest of antlerless moose in the Kuskokwim hunt area during the fall season and add an additional winter antlered bull hunt in Zone 2 under State regulations, which would increase harvest opportunities for federally qualified subsistence users. While Zone 2 cannot support any cow moose harvest, the antlerless moose hunt is targeted for Zone 1 and could help stabilize the moose population in that area, keeping it within sustainable levels. Browse surveys indicate that the population in Zone 1 is potentially reaching a point that will limit or stop growth, and Zone 2 is about one-half of what it could be (Jones 2021, pers. comm.). As both these hunts would be draw permit hunts, the number of permits could be adjusted annually in response to changes in the moose population and hunt conditions. This would protect against overharvest, balancing conservation with harvest opportunity.

The Yukon Delta NWR Manager has been delegated authority from the Federal Subsistence Board to announce a winter moose hunt in Zone 2 when the quota is not met during the fall season. Establishing a corresponding State winter state hunt for Zone 2 could reduce regulatory complexity by bringing State and Federal regulations closer to alignment. Continued coordination between State and Federal managers

would be needed to ensure the Zone 2 harvest quota is not exceeded. However, due to the Federal lands closure, people could only hunt on State-managed lands under State regulations.

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

Rationale: This proposal would increase hunting opportunity for federally qualified subsistence users hunting under State regulations, and there are no conservation concerns. Moose harvest in the Kuskokwim hunt area is already managed through quotas, safeguarding against overharvest. Antlerless moose hunts are an important aspect of moose management in much of Unit 18 and increase hunting opportunity for federally qualified subsistence users. A winter bull hunt in Zone 2, under State regulation, could reduce regulatory complexity and increase opportunities for federally qualified subsistence users. However, the Federal lands closure limits harvest under State regulations to State-managed lands only.

Literature Cited

Jones, P. 2021. Wildlife biologist. Personal communication: email. ADF&G. Bethel, AK.

PROPOSAL 11 – 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 Sept. 1-30.

OR

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

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

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

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose populations. In Unit 18 remainder, where the moose population is large and growing, antlerless hunts provide additional harvest opportunity for federally qualified subsistence users as well as a mechanism to

check the rapid growth of this population, which may be above carrying capacity. The antlerless season in the Goodnews River drainage provides additional opportunity for federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics and is closely managed through harvest quotas.

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

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

PROPOSAL 13 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Increase the bag and possession limits for ptarmigan in Unit 18.

Current Federal Regulations:

Unit 18 – Ptarmigan (Rock and Willow)

15 per day, 30 in possession

Aug. 10–May. 30.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide federally qualified subsistence users with additional opportunity to harvest ptarmigan under State regulations. It would also misalign Federal and State harvest limits, increasing regulatory complexity and confusion.

Adopting this proposal may negatively impact the Unit 18 ptarmigan population, which may not be able to withstand increases in harvest. Ptarmigan numbers appear to be recovering from a population low period of the last 5-7 years (Merizon and Carroll 2023). Summer conditions in 2022 were likely highly favorable for chick survival, but a late winter and cool wet summer in 2023 may have affected breeding success of ptarmigan (Carroll 2023). Avian influenza is widely found in migratory waterfowl in the area, and it is uncertain if/how it may affect the ptarmigan population (Merizon and Carroll 2023).

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 13.

Rationale: Adopting this proposal may cause conservation concerns by increasing ptarmigan harvest to unsustainable levels.

Literature Cited

Merizon, R. A., and C. J. Carroll. 2023. Status of grouse, ptarmigan, and hare in Alaska, 2021 and 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2023-2, Juneau.

Carroll, C.J. 2023. Alaska Small Game Summary 2023. Alaska Department of Fish and Game, Juneau.

PROPOSAL 14 – 5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Open a hunt for muskox in a portion of Unit 18, with permits available to residents only, made available in communities closest to the herd.

Current Federal Regulations:

Unit 18—Muskox

No Federal regulations

No Federal open season

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Federal Subsistence Board will consider two Wildlife Proposals (WP24-22 and WP2-23). WP24-22 requests to establish a customary and traditional use determination for muskox in Unit 18. WP24-23 requests to establish a Federal subsistence hunt for muskox in the mainland portion of Unit 18. The Federal Subsistence Board will consider both proposals at its meeting in April 2024.

Impact to Federal subsistence users/wildlife: If adopted, this proposal would benefit federally qualified subsistence users by providing a new opportunity for them to harvest muskox in Unit 18 under State regulations.

The impacts to the muskox population are uncertain due to limited biological information. As early as 2010, muskoxen have been incidentally counted by the State as having a minimum population of 100 in Unit 18, mainland. By 2015, the minimum count was up to 200 animals in the Unit 18, mainland (Harper and McCarthy 2015), while 174 muskoxen were observed during a 2019 survey (Jones 2023, pers. comm.). These population fluctuations may be largely explained by muskoxen moving off Nelson Island (where there is a current State hunt) to the mainland. Often, these movements are believed to be temporary as muskoxen move back to Nelson Island (OSM 2023).

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 14 **with modification** to establish a may-be-announced season.

Rationale: This proposal would provide additional hunting opportunity for federally qualified subsistence users to meet their subsistence needs. Effects on the muskox population are unknown as little biological and harvest information are currently available. However, limiting the number of permits available and establishing other hunt parameters such as a harvest quota and may-be-announced season can ensure this hunt is sustainable. Having a hunt in codified regulations with the regulatory flexibility to annually open or close the hunt balances conservation with opportunity. A hunt may not be viable for several years but could be announced once more information becomes available. If the Federal Subsistence Board adopts Proposal WP24-23, Federal and State managers should work together to implement a sustainable muskox hunt in Unit 18, mainland.

Literature cited:

Harper, P. and L.A. McCarthy. 2015. Muskox Management Report of Survey-Inventory Activities, 1 July 2012-30 June 2014. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR-2015-2, Juneau, AK.

OSM. 2023. Staff analysis WP24-23. Pages 154-164 in Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Meeting Materials. October 10-12, 2023. Office of Subsistence Management, USFWS. Anchorage, AK.

Jones, P. 2023. Wildlife management biologist. Personal communication: email. ADF&G Div. of Wildlife Conservation, Bethel, AK.

PROPOSAL 15 – 5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Allow the subsistence take of muskox in a portion of Unit 18.

See comments for Proposal 14.

PROPOSAL 16 – 5 AAC 84.270. Furbearer trapping.

Lengthen the wolf trapping season in Unit 18 by one month to end on April 30.

Current Federal Regulations:

Unit 18–Wolf Trapping

No limit.

Nov. 10-Mar. 31

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users trapping wolves under State regulations.

The impact of this proposal on the wolf population is uncertain. The existing harvest limit of ‘no limit’ suggests no conservation concerns for wolf in Unit 18. According to trapper questionnaires, the Region V wolf population may be increasing, while sealing records indicate harvest has declined (**Table 1**, ADF&G 2023). While adopting this proposal would likely increase wolf harvest, it seems unlikely to cause conservation concerns.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

Table 1. Wolf population relative abundance, population trend, reported harvest from sealing records for Region V, and harvest as reported in trapper questionnaire for wolves in Unit 18 (ADF&G 2023).

Regulatory Year	Population Relative abundance (Region V)	Population Trend (Region V)	Harvest as reported in trapper questionnaire (Unit 18)	Reported harvest from sealing records (Region V)
2015/16	scarce	decrease	0	198
2016/17	scarce	increase	17	163
2017/18	common	no change	13	137
2018/19	common	no change	5	53
2019/20	scarce	no change	16	84
2020/21	common	no change	14	93
2021/22	abundant	no change	0	33

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 16.

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to trap wolves under State regulations; however, the impacts on the Unit 18 wolf population are uncertain.

Literature Cited

ADF&G. 2023. Alaska Trapper Reports, 2015-2022.
<https://www.adfg.alaska.gov/index.cfm?adfg=trapping.reports>. Retrieved: November 2, 2023.

PROPOSAL 17 – 5 AAC 85.020. Hunting seasons and bag limit for brown bear.

Increase the brown bear bag limit in Unit 18.

Current Federal Regulations:

Unit 18–Brown Bear

1 bear by State registration permit only

Sept. 1 – May 31

Is a similar issue being addressed by the Federal Subsistence Board? No. However, Proposal WP24-01 requests to allow the sale of brown bear hides statewide.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunities for federally qualified subsistence users hunting brown bear under State regulations. A 2-bear harvest limit would also allow users to sell the hides.

The impact to the Unit 18 brown bear population is uncertain as recent biological and harvest data are not readily available. ADF&G's most recent brown bear management report for Unit 18 is for 2012-2014 (Seavoy 2015). However, local people have observed increasing numbers of brown bears in Unit 18 in recent years (YKDRAC 2023). Brown bears are often managed conservatively due to large home ranges and low reproductive rates (McLoughlin 2002, Miller 2011).

Adopting this proposal would further misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 17.

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to harvest brown bear under State regulations; however, the impact to the Unit 18 brown bear population is uncertain.

Literature Cited

Miller, S.D., J.W. Schoen, J. Faro, D.R. Klein. 2011. Trends in intensive management of Alaska's grizzly bears, 1980-2010. *The Journal of Wildlife Management*. 75(6): 1243-1252.

McLoughlin, P.D., H.D. Cluff and F. Messier. 2002. Denning ecology of barren-ground grizzly bears in the central Arctic. *Journal of Mammalogy*. 83(1):188-192.

Seavoy, R. J. 2015. Units 19, 21A, and 21E brown bear. Chapter 18, pages 18-1 through 18-17 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau.

YKDRAC. 2023. Transcripts of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council proceedings. October 10-12, 2023. Anchorage, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

PROPOSAL 24 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

Modify the winter season for moose in Unit 22A.

Current Federal Regulations:

Unit 22 – Moose

Unit 22A, that portion in the Unalakleet drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of and including the Egavik Creek drainage—1 bull by Federal registration permit.

Aug. 15–Sep. 14.

Federal public lands are closed to the taking of moose except by federally qualified users hunting under these regulations. The BLM Anchorage Field Office is delegated authority to close the season in consultation with ADF&G

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would change the may-be-announced Dec.1–Jan. 31 season to a general season. This would provide additional opportunity to federally qualified subsistence users who could now count on the winter moose season occurring. However, as Federal public lands are closed to anyone hunting under State regulations, only State-managed lands would be available for hunting during the State’s winter season.

No impacts to the moose population are expected as reported harvest for the winter hunt has been very low (0-2 moose annually) and the moose population can withstand additional harvest. Historically, the winter season was offered only when the moose quota was not met during the fall hunt. As the moose population has recovered to within management objectives, there is now no quota established for this hunt. The moose population will still be protected if it decreases in the future as harvest is managed under a registration permit system, RM844 which can be closed by Emergency Order.

Federal Position/Recommended Action: The recommendation is to **support** Proposal 24.

Rationale: Adoption of this proposal may increase federally qualified subsistence user harvest opportunity of moose, and there are no conservation concerns. Codifying the winter season will ensure the winter moose hunt remains available for rural residents, although the Federal lands closure limits hunting opportunity to State-managed lands only.

PROPOSAL 27 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Align the resident seasons for brown bear in Unit 22D and 22E with those in Unit 22B.

Current Federal Regulations:

Unit 22 – Brown Bear

Units 22A, 22D remainder, and 22E—1 bear by State registration permit only Aug. 1–May 31.

Unit 22B—2 bears by State registration permit Aug. 1–May 31.

*Unit 22C—1 bear by State registration permit only Aug. 1–Oct. 31.
Apr. 1–May 31.*

Unit 22D, that portion west of the Tisuk River drainage, west of the west bank of the unnamed creek originating at the Unit boundary opposite the headwaters of McAdam's Creek and west of the west bank of Canyon Creek to its confluence with Tuksuk Channel—2 bears by Federal registration permit July 1–June 30.

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

Impact to Federal subsistence users/wildlife: Aligning all State season dates for brown bear in Units 22C, 22D, and 22E with season dates in Unit 22B will reduce regulatory complexity and confusion. Adopting this proposal would also offer federally qualified subsistence users more opportunity to harvest brown bear in Unit 22 under State regulations. While this may allow for more harvest of brown bear, the Unit 22C population will still be protected as this hunt is managed with a quota and registration permit system.

State season dates currently are not aligned with Federal subsistence brown bear seasons, and this proposal would extend the State season even longer than the Federal season. A similar proposal could be submitted to extend the Federal subsistence brown bear season during the next call for Federal wildlife proposals in early 2025.

Federal Position/Recommended Action: The recommendation is to **support** Proposal 27.

Rationale: Adoption of this proposal would increase federally qualified subsistence user harvest opportunity of brown bear and there are no conservation concerns. The Unit 22C brown bear population would remain protected from overharvest through the quota system currently in place, while the 15-day season extension in Unit 22D and 22E is not expected to result in much additional harvest.

PROPOSAL 30 – 5 AAC 84.270. Furbearer trapping.

Extend the trapping season to year-round for muskrat in Unit 26A.

Current Federal Regulations:

Unit 26 – Muskrat

No limit.

Nov. 1–June. 10.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would offer federally qualified subsistence users more opportunity to harvest muskrat under State regulations. No impacts to the muskrat population are expected, and the current harvest limit of ‘no limit’ under both State and Federal regulations indicates no conservation concerns. Muskrat are a species of lower importance to trappers in

this region, which may be due to a lower market value of their fur or because muskrat relative abundance is estimated as scarce in this region (Bogle 2021).

Adoption of this proposal would misalign Federal and State trapping regulations, increasing regulatory complexity and confusion. A similar proposal could be submitted to extend the Federal muskrat season during the next call for Federal wildlife proposals in early 2025.

Federal Position/Recommended Action: The recommendation is to **support** Proposal 30.

Rationale: Adoption of this proposal would increase federally qualified subsistence user harvest opportunity of muskrat; there are no conservation concerns.

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau

PROPOSAL 31– 5 AAC 85.045. Hunting season and bag limits for moose.

Liberalize the moose bag limit in a portion of Unit 26A and expand the hunt area.

Current Federal Regulations:

Unit 26A—Moose

*Unit 26A—that portion west of the eastern shore of Admiralty Bay July 1-Sep. 14.
where the Alaktak River enters, following the Alaktak River to
155°00' W longitude excluding the Colville River drainage—1 moose,
however, you may not take a calf or a cow accompanied by a calf*

Is a similar issue being addressed by the Federal Subsistence Board? No. However, the Federal Subsistence Board adopted Proposal WP22-54 in April 2022 to modify the Unit 26A moose hunt area to the same boundary as requested by State Proposal 31.

Impact to Federal subsistence users/wildlife: Moving this boundary east and liberalizing the harvest limit changes the moose hunt in this new area (between 156°00' W longitude and the proposed new boundary) to one moose with a longer season. This would provide additional harvest opportunity for federally qualified subsistence users hunting moose under State regulations. The proposed new boundary is a well-known landscape feature that is easy to identify by users (NSRAC 2021).

This proposal would have little impact on the Unit 26A moose population. While the Unit 26A moose population is on the fringe of its range and has decreased since 2008 (Klimstra and Daggett 2020), this proposal poses no conservation concerns due to very low harvest rates. Human harvest of moose is very

low and likely does not significantly influence abundance of the Unit 26A moose population (NSSRAC 2021). According to reported moose harvest from Regulatory Year 2018-2022 nine moose were harvested (Klimstra and Daggett 2020). Moose harvest in Unit 26A remains below the 3% harvestable surplus rate suggested in the Unit 26A moose management plan (Klimstra and Daggett 2020).

Adopting this proposal would align the Federal and State regulations for this hunt area, which would reduce regulatory complexity and confusion. The Federal Subsistence Board adopted Proposal WP22-54 in 2022, which changed the Federal moose hunt area boundaries in Unit 26A to better accommodate subsistence uses.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 31.

Rationale: This proposal poses no conservation concerns, would increase opportunity for federally qualified subsistence users hunting under State regulations, and aligns State and Federal hunt area descriptors.

Literature Cited

Klimstra, R. and Daggett, C. 2020. Moose management report and plan, Game Management Unit 26A: report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Species Management Report and Plan ADF&G/DWC/SMR&P–2020–9. ADF&G. Juneau, AK.

NSSRAC. 2021. Transcripts of the North Slope Subsistence Regional Advisory Council proceedings. November 3, 2021. Utqiagvik, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

PROPOSAL 33 – 5 AAC 85.055. Hunting season and bag limits for Dall sheep.

Reduce the Unit 26A sheep bag limit for residents to one ram with full-curl horn or larger every four regulatory years.

Current Federal Regulations:

Unit 26A – Sheep

Units 26A and 26B (Anaktuvuk Pass residents only), that portion within the Gates of the Arctic National Park—community harvest quota of 60 sheep, no more than 10 of which may be ewes and a daily possession limit of 3 sheep per person, no more than 1 of which may be a ewe July 15–Dec. 31.

Unit 26A (excluding Anaktuvuk Pass residents), those portions within the Gates of the Arctic National Park—3 sheep Aug. 1–Apr. 30.

Unit 26A, that portion west of Howard Pass and the Etivluk River (DeLong Mountains)—1 sheep by Federal registration permit

Season may be announced.

Unit 26A, remainder and 26B, remainder, including the Gates of the Arctic National Preserve—1 ram with $\frac{7}{8}$ curl or larger horn

Aug. 10–Sep. 20.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposals WP24-25 and WP24-26 also address sheep regulations in the Central Brooks Range. However, these proposals request changes for Units 24A, 24B, and 26B rather than for Unit 26A. The Federal Subsistence Board will consider these proposals at their April 2024 meeting.

Impact to Federal subsistence users/wildlife: Adopting this proposal to reduce sheep harvest limits under State regulations may positively impact Unit 26A sheep numbers, which have remained stable at lower levels after declining in 2015/2016 (Schertz 2023). The number of mature rams has also declined dramatically since 2015 (Schertz 2023). Reducing harvest of mature rams and mis-identified sub-legal rams and allowing more of them to remain in the population to breed may lead to increased productivity of the remaining population.

However, adoption of this proposal would reduce federally qualified subsistence users' opportunity to harvest sheep under State regulations. It would also further misalign Federal and State harvest limits, increasing regulatory complexity and confusion.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 33.

Rationale: OSM supports measures to help conserve and recover the Central Brooks Range sheep population. However, OSM does not have enough information on harvest levels or pressure in the affected areas to accurately assess whether these harvest limit reductions would be effective conservation measures or unnecessary restrictions on federally qualified subsistence users hunting under State regulations.

Literature Cited

Schertz, Dylan. 2023. Biologist. Personal communication: email. May 3, 2023. National Park Service. Inventory and Monitoring Program. Fairbanks, AK.

PROPOSAL 35 – 5 AAC 85.050. Hunting seasons and bag limit for muskoxen.

Change the Unit 26A and Unit 26B muskox hunt area boundaries to match federal hunt boundaries and expand the state hunt areas.

Current Federal Regulations:

Unit 26A—Muskox

Unit 26A—that portion west of the eastern shore of Admiralty Bay where the Alaktak River enters, following the Alaktak River to 155°00' W longitude south to the Unit 26A border—1 muskox by Federal drawing permit Aug. 1-Mar. 15

Unit 26A remainder and Unit 26B No open season

Is a similar issue being addressed by the Federal Subsistence Board? No. However, the Federal Subsistence Board adopted Proposal WP22-55 in 2022, which established the Federal muskox hunt in the western portion of Unit 26A and associated hunt area boundary.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional muskox hunting opportunity for federally qualified subsistence users under State regulations. Currently, there is ‘no open season’ for muskox in Unit 26A remainder. This proposal would eliminate the current Unit 26A remainder hunt area by expanding the eastern and western hunt areas, which both have a Tier II muskox hunt. This proposed boundary provides a well-known landscape feature that is easy to identify by users (NSRAC 2021).

This proposal would have minimal impact on the muskox population, which is closely managed under a Tier II permitting system. The muskox population has increased in the western portion of Unit 26A from 253 in 2016 to 455 in 2020 (NSRAC 2021). The muskox population has increased in the eastern portion of Unit 26A and Unit 26B above management objectives (NSRAC 2021), and the State issued RY 2023/24 Tier II permits (TX108) for the first time since 2005 (ADF&G 2023).

Adopting this proposal would align the Federal and State hunt area boundaries for muskox in Unit 26A, which could reduce regulatory complexity and confusion. The Federal Subsistence Board adopted Proposal WP22-55 in 2022, which established the Federal muskox hunt and hunt area boundaries in Unit 26A to accommodate subsistence users. The TX108 hunt area is part of the Federal Unit 26A remainder hunt area. If the Board of Game adopts Proposal 35, OSM strongly encourages the State to identify the expanded TX108 hunt area as Unit 26A remainder to align with the Federal hunt area. If the TX109 hunt area is identified as Unit 26A remainder under State regulations, that would be opposite the Federal hunt area descriptors, which would greatly increase regulatory complexity and confusion.

Federal Position/Recommended Action: The OSM recommendation is **support** Proposal 35.

Rationale: This proposal poses no conservation concerns, would increase opportunity for federally qualified subsistence users, and aligns State and Federal hunt areas. OSM recommends the expanded TX108 hunt area to become Unit 26A remainder (not TX109), so that Federal and State hunt area descriptors match.

Literature Cited

ADF&G. 2023. General Harvest Reports.

<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvest.lookup&MSG=No%20records%20match%20your%20search%20criteria%2E>. Retrieved: November 2, 2023.

NSRAC. 2021. Transcripts of the North Slope Subsistence Regional Advisory Council proceedings. November 3, 2021. Utqiagvik, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

PROPOSAL 36 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the caribou bag limit for residents in Unit 23 from five caribou per day to four caribou total, only one of which may be a cow.

See comments for Proposal 2.

PROPOSAL 37 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the caribou bag limit for residents in Unit 23 from five caribou per day to four caribou total, only one of which may be a cow.

See comments for Proposal 2

PROPOSAL 39 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown bear hunting season in Unit 23 for residents to no closed season.

Current Federal Regulations:

Unit 23—Brown Bear

Unit 23—2 bears by State subsistence registration permit

July 1–June 30.

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

Impact to Federal subsistence users/wildlife: Lengthening the State brown bear season to year-round would provide additional opportunity for federally qualified subsistence users to harvest brown bear under State regulations. It would also reduce regulatory complexity and confusion by aligning State and

Federal regulations. No negative impacts on the Unit 23 brown bear population are expected, especially since the take of cubs and sows with cubs is prohibited. Observations from local users reporting frequent brown bear sightings (NWARAC 2017, 2022, 2023) and the two-bear harvest limit under State and Federal regulations indicate no conservation concerns.

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

Rationale: This proposal provides additional opportunity for federally qualified subsistence users and there are no conservation concerns for brown bear in Unit 23.

Literature Cited

NWARAC. 2017. Transcripts of the Northwest Arctic Subsistence Regional Advisory Council proceedings. October 25-26, 2017. Kotzebue, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

NWARAC. 2022. Transcripts of the Northwest Arctic Subsistence Regional Advisory Council proceedings. February 14-15, 2022. Teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.

NWARAC. 2023. Transcripts of the Northwest Arctic Subsistence Regional Advisory Council proceedings. March 7-8, 2023. Teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.

PROPOSAL 40 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown/grizzly bear hunting season in Unit 23 for residents to year-round.

See comments for Proposal 39.

PROPOSAL 41 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown/grizzly bear hunting season in Unit 23 for residents to year-round.

See comments for Proposal 39.



PC 406

Name: Olesen, Ben

Community of Residence: American Fork Utah

Submission Time: 1/11/2024 11:07:06 PM

Comment:

I oppose to Proposal 3

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

Proposal 3: Oppose



PC 407

Name: Oller, Kevin

Community of Residence: Higbee, MO

Submission Time: 1/13/2024 2:56:53 AM

Comment:

I am a non-resident that would like to hunt Caribou in AK one day. I do not support proposal 3 or 38 closing the hunting opportunity to non-residents. There is not enough scientific evidence linking a decline in caribou numbers to non-resident hunting pressure.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 408

Name: Olsen, Eric

Community of Residence: Minneapolis, Minnesota

Submission Time: 1/12/2024 11:34:58 PM

Comment:

Hello, thank you for the opportunity to provide a comment on these proposals.

I am commenting on proposals 3 and 38.

I oppose proposal 3.

I oppose proposal 38.

I am a non-resident hunter, and realize the states responsibility to manage its wildlife for residents of the state. However, I worry in this case the biology and science does not back up the justification for proposals 3 and 38. It doesn't seem that the result of proposals 3 or 38 would have the benefit that residents of the state are hoping for.

I urge the state to consider that further detailed scientific study would need to be completed, and that the ultimate solution to the issues that proposals 3 and 38 are meant to address may indeed require a much more complex and layered solution. Restricting the hunting of caribou by non-residents will not have any measurable impact positive or otherwise on the carribu herd in question - the biology and science support that nonresident hunter harvests have a non-measurable impact on the caribou herd numbers. To solve this issue, detailed scientific study needs to be completed to understand the true root of the problem so that it can be addressed through proper means and solutions. But restricting non-resident hunting of caribou is not the answer, and I urge the state to oppose proposals 3 and 38.

Thank you for your consideration.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 409

Name: Olsen, Kyler

Community of Residence: Montana

Submission Time: 1/8/2024 8:08:04 PM

Comment:

#3 and #38 Both of these proposals would mean the single largest loss of opportunity for hunters and outdoorsmen that the United States has ever seen. Instead of an all out closure a far better course of action would be to manage the hunts with quotas and tag allocations such as all other states do.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 410

Name: Olsen, Tylor

Community of Residence: Corvallis, Montana

Submission Time: 1/3/2024 2:47:33 PM

Comment:

Hunting in these areas is a massive part of not only the residents of Alaska, but those non residents that book hunts with non resident outfitters, who employ non resident guides. The results of these hunts does in fact harvest game, but also results in thousands and thousands of dollars to locals. Outfitters that employ local pilots are a huge source of income. In addition to the monetary increase to local Alaska communities, there would be a massive loss to local meat donations, that are usually donated by non resident hunters. I strongly oppose these bills not only for the opportunities the state of Alaska brings me, but the benefits it bring my friends in these local areas that benefit from the hunting of non residents.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 411

Name: Olthuis, Derek

Community of Residence: Manti, Utah

Submission Time: 1/3/2024 5:52:05 PM

Comment:

I believe that closing non resident hunts will further hurt caribou and other herds due to the decrease in revenue available to support recovery efforts. Perhaps size limits should be imposed for non residents to harvest an older age class of animal. Non resident hunts can remain open while allowing the herds to grow and still allowing locals to live a subsistence lifestyle all without decreasing the revenue to the state and recovery efforts.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 412

Name: O'Neill, Andrew

Community of Residence: Laramie, Wyoming

Submission Time: 1/9/2024 10:51:07 PM

Comment:

Good day,

I am writing in opposition of proposals 3 and 38 to eliminate nonresident caribou hunting. As a nonresident hunter in the exciting process of planning my first Alaskan hunt, this is troubling news that I believe fails to address the root cause of this herd's decline and acts simply as a band-aid fix on a much deeper issue. With dramatically rising costs for all western hunting, Alaskan Caribou hunting has remained one of the few reasonably attainable opportunities for nonresident hunters, and that opportunity is threatened by a proposition that, to me, seems to be more of knee-jerk reaction than a legitimate solution based on science. I hope you will consider the effect these proposals will have on nonresident hunting opportunities, as well as the loss of revenue to local guide services, transporters, processors, taxidermists, etc.

Thank you,

Andrew O'Neill

Laramie, Wyoming

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

Proposal 3: Oppose



PC 413

Name: Orr, Lee

Community of Residence: Amarillo, Texas

Submission Time: 1/10/2024 9:37:44 PM

Comment:

Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Oswalt, Christopher

Community of Residence: SHERWOOD, OR

Submission Time: 1/9/2024 4:40:29 AM

Comment:

Ten points on why proposals #3 and #38 should be opposed:

Limited Impact of Non-Resident Hunting: Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

Subsistence Hunting Impact: The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

Precedent for Wildlife Management: The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing.

Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

Cultural and Recreational Loss: The closure would deny non-residents the cultural and recreational experience of hunting in this unique region.

Potential for Better Management Practices: Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability.

Need for Comprehensive Approach: Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: overly, terry

Community of Residence: tok alaska

Submission Time: 1/13/2024 2:00:17 AM

Comment:

proposal #3 I'm (opposed) to close nonresident caribou hunting in units 21,22,23,24 and 26a first of all there is no accurate way to measure if ANS is being met at this time. what we do know is that nonresident hunters are the largest funders of ADF&G through high priced license and tag sales. We also know that the impact on harvest is negligible. however, by eliminating them the impact to ADF&G funding as well as residents of Alaska who rely on them for their lively hood is devastating. in addition, lumping all of these units into one proposal is lazy and does not target the problem areas.

proposal #4 I'm strongly (opposed) units 23 and 26a are two totally different areas on opposite sides of the Brooks Range and 23 has one caribou herd whereas 26a has three separate caribou herds .to make 26a part of 23's problem is not logical and is harmful to the people who rely on Caribou harvests in 26A. unit 23 should in no way be allowed to dictate unit 26 harvest. plus, with no means of recording subsistence use and no way of showing if ANS is being met. there is no way of knowing if any action is prudent at this time.

proposal #5 I'm (OPPOSED) to go to draw or a registration for non-residents. This Creates a huge hurdle if not an impossibility for a guide operator to book his season. therefore, in my opinion it's the same as not allowing them to hunt. Once again, no action is needed until we can gather data showing the ANS is not being met.

proposal #32 I'm (OPPOSED) there is no reason or justification to change the Anaktuvuk controlled use area to encompass half of unit 26a. I'm located 80 miles north of Anaktuvuk pass and have never seen another operator in that country in the past 14 years. i feel this action would only create flying hazards for those who continue to operate within the regulation by eliminating safe landing locations in bad weather.

proposal #42 I'm (OPPOSED)

thank you for your consideration.

terry(striker)overly

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

Proposal 1: Oppose Proposal 2: Oppose Proposal 3: Oppose Proposal 4: Oppose Proposal 5:
Oppose Proposal 6: Oppose Proposal 7: Oppose Proposal 8: Oppose Proposal 10: Oppose
Proposal 11: Oppose Proposal 12: Oppose Proposal 13: Oppose Proposal 14: Oppose Proposal

15: Oppose Proposal 16: Oppose Proposal 17: Oppose Proposal 18: Oppose Proposal 19: Oppose Proposal 20: Oppose Proposal 21: Oppose Proposal 22: Oppose Proposal 23: Oppose Proposal 24: Oppose Proposal 25: Oppose Proposal 26: Oppose Proposal 27: Oppose Proposal 28: Oppose Proposal 29: Oppose Proposal 30: Oppose Proposal 31: Oppose Proposal 32: Oppose Proposal 33: Oppose Proposal 34: Oppose Proposal 35: Oppose Proposal 36: Oppose Proposal 37: Oppose Proposal 38: Oppose Proposal 39: Oppose Proposal 40: Oppose Proposal 41: Oppose Proposal 42: Oppose Proposal 190: Oppose Proposal 209: Oppose



PC 416

Name: Owen, Adam

Community of Residence: Fairbanks, Alaska

Submission Time: 1/3/2024 1:30:45 AM

Comment:

I oppose proposals 3 and 38 because harvest data is indisputable that hunters, regardless of resident, nonresident, or subsistence have negligible impact to caribou populations and migratory routes.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 417

Name: Owen, Bruce

Community of Residence: Winchester, CA

Submission Time: 1/13/2024 2:27:33 AM

Comment:

Strongly oppose proposal's 3 and 38.

If passed, proposals 3 and 38 would seek to completely remove hunter opportunity for non residents who, according to the data, make up .1% of the statistical harvest rates. Removing non residents from hunting Caribou in Alaska is not the logical solution to this problem. If we follow this logically and we remove non residents from hunting caribou, we can deduce that the Caribou population would only improve by .1%, pending changes in climate and predator harvest over the next year. If you remove opportunity for non residents to hunt Caribou, you will also simultaneously be damaging the small businesses in the industry dedicated to guiding and outfitting non residents, flying non residents to remote locations for their respective hunting trips, and taking money from the lodging and restaurant's that the non residents would otherwise be bringing in. These proposals need to be rethought and analyzed with different data points to come up with a proper solution and not a band aid.

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

Proposal 2: Support Proposal 3: Oppose Proposal 5: Support Proposal 6: Support
Proposal 36: Support Proposal 37: Support Proposal 38: Oppose



Name: Page, Rustin

Community of Residence: Corsicana, Texas

Submission Time: 1/7/2024 1:26:54 AM

Comment:

Non-resident hunting shouldn't continue to be restricted. It brings in valuable tax dollars. Resident hunting limits should be reduced to more realistic numbers.

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

Proposal 1: Oppose Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Support Proposal 6: Oppose Proposal 7: Oppose Proposal 8: Oppose Proposal 10: Oppose Proposal 11: Oppose Proposal 12: Oppose Proposal 13: Oppose Proposal 14: Oppose Proposal 15: Oppose Proposal 16: Support Proposal 17: Oppose Proposal 18: Support Proposal 19: Oppose Proposal 20: Support Proposal 21: Oppose Proposal 22: Oppose Proposal 23: Support Proposal 24: Oppose Proposal 25: Oppose Proposal 26: Support Proposal 27: Oppose Proposal 28: Oppose Proposal 29: Support Proposal 30: Oppose Proposal 31: Oppose Proposal 32: Oppose Proposal 33 Support Proposal 34: Oppose Proposal 35: Oppose Proposal 36: Support Proposal 37: Support Proposal 38: Oppose Proposal 39: Oppose Proposal 40: Oppose Proposal 41: Oppose Proposal 42: Oppose Proposal 190: Oppose Proposal 209: Oppose



PC 419

Name: Pagnac, Allen

Community of Residence: East Bethel MN

Submission Time: 1/11/2024 7:31:01 PM

Comment:

My name is Allen Pagnac, a hunter and conservationist, from MN. I am reaching out as I oppose proposal 3 and 38 for the closure of caribou hunting in NW Alaska for non- residents.

The history of time shows us that caribou herds fluctuate over time for multiple reasons. The Western Arctic Herd numbered only about 75,000 animals in 1975, after declining from 242,000 in 1970. It then rebounded to 343,000 animals by 1985. I am asking the board to not keep a pulse on this however removing the access to non-residence is not the solve.

In this proposal, a group of hunters is requesting to limit another group of hunters to give up their access for the herd. Non residence harvest roughly 250 adult male caribou a year. To harvest 250 adult males out of a herd of roughly 150-200k animals will not influence the overall population of the herd. Herd populations are dependent on cows and calves.

I am happy that substance take is also being looked at since that take is roughly 10,000-14,000 animals a year. I appreciate that this is not one sided since the reduction of 5 animals per day to 4 per year.

As a hunter and a conservationist, we are having to fight for our right to hunt daily with different groups. To have to do this with another group of hunters and conservationist is frustrating. For a group of hunters to harvest 250 adult males each year out of a herd of 150-200k animals has zero impact on that herd. The herd is dependent on the adult female population as well as the fawns. For the proposal to be brought up at alone brings attention to alternative motives.

Again, I oppose proposal 3 and 38 for the closure of caribou hunting in NW Alaska for non-residents.

Thank you for your time.

Allen Pagnac

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 420

Name: Pagnac, Allen

Community of Residence: East Bethel mn

Submission Time: 1/11/2024 8:23:23 PM

Comment:

I oppose proposals 3 and 38. I fear once we remove non residents ability to hunt her, even with an increased population of caribou, the opportunity will never be given back.

The caribou herd will lose the interest from those who spend money to hunt it and anytime an animal loses hunting interest it becomes less supported.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 421

Name: Pagnac, Kristina

Community of Residence: East Bethel MN

Submission Time: 1/11/2024 7:34:52 PM

Comment:

I oppose proposal 3 and 38. The closure of this to non residence will not have an impact on the herd as the average take is 250 males. Herds are managed by cow and calve population. Hunters for other hunters as well as conservation.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 422

Name: Pahl, Colin

Community of Residence: Denver, CO

Submission Time: 1/4/2024 2:51:22 AM

Comment:

I oppose proposals 3 and 38. The proposal to reduce non-resident tag allocations is not based on sound wildlife management. Further it will hurt local communities.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 423

Name: Palacios, Cody

Community of Residence: Dallas, Texas

Submission Time: 1/3/2024 12:52:11 PM

Comment:

I strongly oppose proposal 3 and 38 and would like to hunt Alaska in the future as a non-resident.

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

Proposal 1: Oppose Proposal 2: Oppose Proposal 3: Oppose Proposal 4: Oppose Proposal 5: Oppose Proposal 6: Oppose Proposal 7: Support with Amendment Proposal 8: Support Proposal 10: Oppose Proposal 11: Support Proposal 12: Support Proposal 13: Support Proposal 14: Oppose Proposal 15: Oppose Proposal 16: Support Proposal 17: Oppose Proposal 18: Support Proposal 19: Oppose Proposal 20: Support with Amendment Proposal 21: Support Proposal 22: Support Proposal 23: Oppose Proposal 24: Oppose Proposal 25: Oppose Proposal 26: Support Proposal 27: Support Proposal 28: Support Proposal 29: Support Proposal 30: Support Proposal 31: Support Proposal 32: Support Proposal 33 Support Proposal 34: Support Proposal 35:

Support Proposal 36: Support Proposal 38: Oppose Proposal 39: Support Proposal 40: Support Proposal 41: Support



PC 424

Name: Pape, Spencer

Community of Residence: Wasilla, AK

Submission Time: 1/13/2024 4:02:33 AM

Comment:

Dear Board of game members,

I am in support of proposal 33. This 1 ram every 4 years for residents proposal was intended to be a state wide proposal and I failed to understand the BOG meeting schedule and process at the time I submitted it. I now understand that this proposal as written for 26A will have little to no effect. Nonetheless, I believe it to have merit and help set the precedent for the future in other units that have Dall sheep. This proposal as written will have similar effects as the rule of 1 brown bear every 4 years in unit 8 & 9. Effects such as, overall decreased hunting pressure on the sheep, hunters being more selective in the ram that they harvest, and an overall decrease in hunter crowding. The main goal is to provide opportunity and this proposal as written will help sustain Dall sheep hunting opportunities.

Thank you.

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

Proposal 33 Support



Name: Patton, Gage

Community of Residence: Atlanta, Georgia

Submission Time: 1/12/2024 7:11:19 PM

Comment:

Subject: Strong Opposition to the Elimination of Nonresident Hunting of Caribou in Game Management Units 21D, Remainder 22, 23, 24B Remainder, 24C, 24D, and 26A

Gage Patton

[Redacted]

[Redacted]

[Redacted]

Dear Alaska Game and Fish,

I am writing to vehemently oppose the proposed elimination of nonresident hunting of caribou in Game Management Units 21D, Remainder 22, 23, 24B Remainder, 24C, 24D, and 26A. As a passionate participant in hunting and conservation, and a lover of Alaska's natural resources and big game animals, I believe this measure overlooks critical factors, especially the limited impact of nonresident hunters compared to the significant harvests by subsistence hunters.

While I understand the importance of wildlife management, it is essential to consider the numbers involved. The caribou harvested by nonresident hunters in these units typically is only about 200-300 animals annually. This number pales in comparison to the thousands of caribou harvested by subsistence hunters each year. Subsistence hunters harvest between 9,000-13,000 caribou per year, conservatively. Many of these animals harvested by subsistence hunters are cows and calves. While I do recognize the value of subsistence hunters to acquire meat to feed their families for the year, excessive cow and calf harvest is not a good strategy for ensuring population growth. The point is that non-resident hunters are not causing population declines of caribou in these units. Therefore, restricting non-resident hunting altogether in these units would not address the population decline issues. Additionally, eliminating nonresident hunting in these units would take away significant economic opportunities for the businesses that depend on the revenue supplied by nonresident hunters hunting caribou in these units.

The revenue generated from nonresident hunting permits is also crucial for funding conservation programs and habitat preservation initiatives. This funding becomes even more significant when compared to the relatively small number of caribou harvested by nonresident hunters. Rather than completely prohibiting nonresident hunting, I urge the Alaska Department of Fish and Game to explore alternative solutions. Allocating a certain number of permits for nonresident caribou hunters in these units, applying stricter regulations on subsistence harvest (such as limiting cow and calf harvest), or imposing a primitive weapons requirement for the hunt, could

all be beneficial solutions that would preserve non-resident hunting opportunities in these units, but would apply a conservation mindset to hunting this awesome species.

Thank you for considering the nuances of this matter. I trust that the Department will weigh the evidence of nonresident hunters' limited impact and explore alternative management strategies that maintain a healthy balance between conservation and economic sustainability.

Sincerely,

Gage Patton

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

Proposal 3: Oppose



PC 426

Name: Pekala, David

Community of Residence: O'Fallon, IL

Submission Time: 1/12/2024 5:26:10 PM

Comment:

Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves. The #3 & #38 proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest. Finally, there is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 427

Name: Perales, Jeffrey

Community of Residence: Deming, New Mexico

Submission Time: 1/13/2024 1:09:05 AM

Comment:

I oppose proposal #3 and #38. While I respect the resources and availability for Alaska residents. I do believe this will set bad precedent among the western states for a public resource. What kind of country are we coming to when we deprive US citizens from using the public resources. I'm also sure non-resident hunting brings in lots of revenue to small communities in Alaska. This would put a lot of small local business out of business. Please keep the hunting of a public resource open to all US Citizens.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 428

Name: Perkins, Alexander

Community of Residence: Calhoun, GA

Submission Time: 1/9/2024 12:37:46 PM

Comment:

I am very concerned around the negative impacts of proposals 3 & 38. Non-Resident hunting in Alaska offers significant monetary value to local areas and removing the ability to Caribou and Black Bear hunt in those areas can be detrimental to certain communities and/or businesses. There is no evidence to suggest that Non-Resident hunters are having a negative impact on overall population, population health, or environmental impact. Please consider voting no for proposals 3 & 38 and keeping Non-Resident hunting the same.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 429

Name: Perry, Joseph

Community of Residence: Wellington

Submission Time: 1/13/2024 12:10:55 AM

Comment:

Proposal 3 and 38

I oppose these proposals that limit/ end my ability to hunt caribou in Alaska

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 430

Name: Persons, Kate

Community of Residence: Nome, AK

Submission Time: 1/12/2024 5:47:58 PM

Comment:

See attached.

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

Proposal 21: Oppose

BOG Muskox Comments

Proposal 21 – Oppose

I oppose Proposal 21 and advocate changing the current season for cow muskoxen to Jan 1—Mar 15.

I do not object to managing for fewer muskoxen in Unit 22C, or to a cow harvest to help accomplish a reduction in numbers. However, I am concerned about the potential harvest of cows that are nursing calves in late summer and fall. A Jan 1—Mar 15 cow season would give calves a better nutritional advantage going into the winter.

Muskox calves nurse well into the winter. Cows and calves are often widely separated and it can be very time-consuming and difficult to sort out who goes with whom even when the herd is undisturbed, and impossible once the herd bunches up in response to a threat. It is not reasonable to expect hunters to avoid accidental harvest of lactating cows.

Please consider the following excerpts from UAF research published in the Canadian Journal of Zoology (Parker et al. 1990):

“Muskoxen and caribou live in similar arctic environments, often eating similar forages. Their lactational strategies, however, are very different, at least in terms of length. Muskoxen in good body condition continue to nurse their young throughout the rutting period, until December to February, and in the field may lactate throughout the winter (White et al. 1989).”¹

And

“Adult female muskoxen, with greater body reserves than caribou at parturition, maintain body weight throughout the summer and produce a less concentrated milk of lower quality, but undergo a substantially longer lactation period into midwinter. This strategy may serve to maintain the female-offspring bond throughout the winter and suggests a more prolonged maternal investment by muskoxen than by caribou.”¹

During the last two winters while observing and photographing muskoxen cratering through thick ice to feed on the tundra below, I have watched the difficulty calves have penetrating the ice with their hooves, and noticed that they are frequently displaced from craters by older, larger animals. My anecdotal observations make me think these apparent difficulties could increase the importance of nursing if icing events become more frequent, as predicted.

Unless there is definitive data showing that calves in non-captive situations are not jeopardized by the loss of their mother and inability to nurse into the winter months, I oppose a cow hunt early in the season.

Failure of orphaned calves to thrive is not a population concern if the intent is to reduce the herd size. But, is it good wildlife management to consider only population size and adopt regulations that potentially result in orphaned calves that may still be dependent on their mothers? Do the Department and the State of Alaska want to be known for orphaning muskox calves?

Additionally, cows harvested during a time of year when there is little or no qiviut in the hide wastes a valuable resource that muskoxen provide.

I also object to the current regulation that allocates the entire harvest quota to a small portion of Unit 22C beyond the outskirts of Nome. The Unit 22C harvest quota was increased three-fold from 9 to 30 muskoxen for the 2023 regulatory year.

I urge that harvest be allowed throughout Unit 22C rather than allotting the entire large harvest quota exclusively to this small area.

It is dismaying to find myself living in the portion of Unit 22C now designated for heavy harvest intended to reduce muskox numbers around the town of Nome. For 29 years my husband and I have lived 13 miles outside of Nome in what is the northern part of the "inner hunt area." Enjoyment of our wild neighbors is a primary reason we live here. We appreciate muskoxen in particular because they are so observable. There have been no problems with muskoxen out here.

The herds within view of the road are often the same herds we and others watch from our homes and enjoy on our commutes to town. It is likely those groups will now see increased hunting pressure in winter, which may disperse them in unknown ways, perhaps even driving them closer to Nome.

The herds along the road and those closest to town will likely experience increased harvest pressure from the increase in permit numbers alone, without requiring that animals be harvested only there.

Everywhere that people and wildlife coexist, there are those who love their wild neighbors and those who resent or fear them. And Nome is no different. In the aftermath of the tragic fatality of December 13, 2022 a number of people, including

myself, were reluctant to publicly voice our appreciation for muskoxen out of respect for the deceased and his loved ones.

There was a widely circulated questionnaire that solicited complaints about muskoxen. It was presented as a public opinion poll, which it was not. It was designed only to capture complaints about muskoxen—a multiple choice question asking how many times a respondent had had negative experiences with muskoxen did not even have the option of selecting “0”.

As a result, the Department and Board have perhaps heard a lopsided and unrepresentative anti-muskox sentiment from residents of Nome. For many of us, the presence of muskoxen enriches our lives in various ways; providing meat; qiviut, the warmest of all wools collected from hides and from the willows; horn for carving; and the pleasure of watching fellow living beings roam the landscape.

In summary I suggest the following:

Unit 22C (Inner Nome Area) One Bull ... TX095 Aug 1- Mar 15 or One Cow ... TX095 May be Announced Jan 1-Mar 15

Unit 22C (Remainder) One Bull ... TX096 Aug 1- Mar 15 or One Cow ... TX096 May Be Announced Jan 1-Mar 15

Thank you for considering my comments.

Kate Persons

Nome, AK

1. PARKER, K.L., WHITE, R.G., GILLINGHAM, M.P., HOLLEMAN, D.F 1990. Comparison of energy metabolism in relation to daily activity and milk consumption by caribou and muskox neonates. Can. J. Zool. 68(1):106-114



PC 431

Name: Pharr, Joseph

Community of Residence: Phoenix, Arizona

Submission Time: 1/6/2024 1:23:54 AM

Comment:

Proposal #3 requests the entire closure of non-resident caribou opportunities in units 22, 23, 24C, 24D, 26A, and portions of 21D and 24B.

Proposal #38 requests the closure of unit 23 for all non-resident caribou hunting seasons.

These proposals are not back by any facts only opinions. I hope you will see this is an attack on hunters and will not pass these proposals. Thank you for your time.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 432

Name: Phillips, Matt

Community of Residence: Parkdale, Oregon

Submission Time: 1/8/2024 7:54:19 PM

Comment:

In regards to proposals 3 and 38, I am a non resident hunter that has hunted Alaska. It was amazing and I can't wait to come back and bring my boys. You'll undoubtedly get plenty of emails like mine talking about non resident impact compared to resident and especially subsistence hunters. You'll hear about conservation and state management vs federal management. Talk of population cycles will occur. Yards yadda. Please, do not approve #3 and 38. Future sportsman and supporters of a wild Alaska are at stake.

Matt Phillips

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Phipps, James

Community of Residence: Henderson

Submission Time: 1/6/2024 3:07:25 AM

Comment:

Oppose all NR closures. So now Alaskan are just out for themselves?

I will be encouraging my congressional delegation to oppose all things Alaska. That is how this adversarial will work.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Pickar, Dan

Community of Residence: Powell, WY

Submission Time: 1/6/2024 3:23:15 AM

Comment:

There is no upside in closing caribou hunting to nonresident in the proposals listed for the State of Alaska or its wild game animals.

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

Proposal 1: Support Proposal 2: Oppose Proposal 3: Oppose Proposal 4: Support Proposal 5: Support Proposal 6: Oppose Proposal 7: Support Proposal 8: Support Proposal 10: Support Proposal 11: Support Proposal 12: Oppose Proposal 13: Support Proposal 14: Support Proposal 15: Oppose Proposal 16: Support Proposal 17: Support Proposal 18: Support Proposal 19: Support Proposal 20: Support Proposal 21: Support Proposal 22: Oppose Proposal 23: Support Proposal 24: Support Proposal 25: Oppose Proposal 26: Support Proposal 27: Support Proposal 28: Support Proposal 29: Support Proposal 30: Support Proposal 31: Support Proposal 32: Support Proposal 33 Support Proposal 34: Support Proposal 35: Support Proposal 36: Support Proposal 37: Support Proposal 38: Oppose Proposal 39: Support Proposal 40: Support Proposal 41: Support Proposal 42: Support Proposal 190: Support Proposal 209: Support



PC 435

Name: pickett, jacob

Community of Residence: Oakville, CA

Submission Time: 1/11/2024 10:37:19 PM

Comment:

I oppose proposal 3 & 38 for the following reasons:

While residents have greater rights to state managed game, the caribou management is unjustifiably liberal even for those (such as myself) who feed themselves and family on game meat. The impacts of these residential, subsistence, and native limits have far more impact on heard population than non-resident hunters. 5 caribou per day? 7-month cow season? Alaska, in my opinion, has the best game management in the state, but this is not game management. This is non-management. These regulations seem to be set as if your goal is to make it unregulated. A look in the mirror will show you will the problem is internal its just easier to blame others (non-residents). Non-residents who are still US citizens and have some right to the fruits of our county, especially considering Alaska takes in more tax dollars than they pay into the federal government.

Additional reasons for opposition:

Limited Impact of Non-Resident Hunting: Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

Precedent for Wildlife Management: The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing.

Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

Cultural and Recreational Loss: The closure would deny non-residents the cultural and recreational experience of hunting in this unique region.

Potential for Better Management Practices: Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability.

Need for Comprehensive Approach: Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

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

Proposal 2: Support Proposal 3: Oppose
Support Proposal 38: Oppose

Proposal 36: Support Proposal 37:



PC 436

Name: Pietila, Alan

Community of Residence: Dassel, MN

Submission Time: 1/5/2024 10:34:01 PM

Comment:

I am commenting on the behalf of myself and other non-residents who wish to preserve the future of hunting for years to come. I get that closing these units to hunting for non-residents should help with the rebound of caribou populations in these areas. But I propose to leave the seasons open and putting a quota on the harvest, or the number of tags for purchase would also help with this issue. If the seasons get closed to hunting, they probably won't be opened again in the future with all the people who fight to end hunting all together. And I, like many others, would like to go on a caribou hunt someday in Alaska. I would also hope that there are these kinds of opportunities for generations to come.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 437

Name: Pietruszewski, Kevin

Community of Residence: PARK CITY, MT

Submission Time: 1/11/2024 7:39:06 PM

Comment:

My name is Kevin Pietruszewski, a hunter and conservationist, from Montana. I am reaching out as I oppose proposal 3 and 38 for the closure of caribou hunting in NW Alaska for non-residents.

The history of time shows us that caribou herds fluctuate over time for multiple reasons. The Western Arctic Herd numbered only about 75,000 animals in 1975, after declining from 242,000 in 1970. It then rebounded to 343,000 animals by 1985. I am asking the board to not keep a pulse on this however removing the access to non-residence is not the solve.

In this proposal, a group of hunters is requesting to limit another group of hunters to give up their access for the herd. Non residence harvest roughly 250 adult male caribou a year. To harvest 250 adult males out of a herd of roughly 150-200k animals will not influence the overall population of the herd. Herd populations are dependent on cows and calves.

I am happy that substance take is also being looked at since that take is roughly 10,000-14,000 animals a year. I appreciate that this is not one sided since the reduction of 5 animals per day to 4 per year.

As a hunter and a conservationist, we are having to fight for our right to hunt daily with different groups. To have to do this with another group of hunters and conservationist is frustrating. For a group of hunters to harvest 250 adult males each year out of a herd of 150-200k animals has zero impact on that herd. The herd is dependent on the adult female population as well as the fawns. For the proposal to be brought up at alone brings attention to alternative motives.

Again, I oppose proposal 3 and 38 for the closure of caribou hunting in NW Alaska for non-residents.

Thank you for your time.

Kevin Pietruszewski

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 438

Name: Pietruszewski, Mike

Community of Residence: Isanti MN

Submission Time: 1/11/2024 7:48:42 PM

Comment:

I oppose proposal 3 and 38. The closure of this to non residence will not have an impact on the herd as the average take is 250 males. Herds are managed by cow and calve population. Hunters for other hunters as well as conservation.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 439

Name: Pietruszewski, Nathan

Community of Residence: Rosemont MN

Submission Time: 1/11/2024 8:15:15 PM

Comment:

I oppose proposal 3 and 38. The closure of this to non residence will not have an impact on the herd as the average take is 250 males. Herds are managed by cow and calve population. Hunters for other hunters as well as conservation.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 440

Name: Pike, Tyler

Community of Residence: East Wenatchee WA

Submission Time: 1/13/2024 3:20:29 AM

Comment:

Limited Impact of Non-Resident Hunting: Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

Subsistence Hunting Impact: The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

Precedent for Wildlife Management: The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing.

Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

Cultural and Recreational Loss: The closure would deny non-residents the cultural and recreational experience of hunting in this unique region.

Potential for Better Management Practices: Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability.

Need for Comprehensive Approach: Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 441

Name: Pilkington, Jamie

Community of Residence: Virginia Beach Va.

Submission Time: 1/8/2024 6:26:44 PM

Comment:

Please keep open the opportunity for non residents to hunt bull caribou. The amount of bull Caribou taken to the amount of revenue it brings in for the community and wildlife recourses out weighs 10-1.

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

Proposal 1: Oppose Proposal 2: Oppose Proposal 3: Oppose Proposal 4: Oppose



Name: Planer, Paul

Community of Residence: Gunnison, CO

Submission Time: 1/4/2024 2:39:08 AM

Comment:

When declines in populations occur, the select harvest of males, and decreasing or eliminating female harvest has long been the standard practice for sustainable wildlife management.

Proposal 3 and 38 would have zero effect on overall population models as non-residence are selecting bulls with their harvest. I don't support eliminating seasons while overlooking the ongoing female harvest in unsustainable numbers.

I think it's time to start looking at overall herd health and composition of harvest data and make sounds scientific decisions based on those facts, instead of emotions.

I do not support Prop 3 or Prop 38.

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

Proposal 2: Support with Amendment Proposal 3: Oppose Proposal 4: Oppose Proposal 5:
Support with Amendment Proposal 6: Oppose Proposal 12: Support Proposal 21: Oppose
Proposal 22: Support Proposal 25: Oppose Proposal 26: Support with Amendment
Proposal 36: Support with Amendment Proposal 37: Support with Amendment Proposal 38:
Oppose



PC 443

Name: Plasencia, Richard

Community of Residence: Miami, FL

Submission Time: 1/2/2024 1:30:30 PM

Comment:

Banning non-resident caribou hunting seems to be the latest attempt for a non-hunting buerocrat to regulate something they know very little about. So I'll focus on money which all politicians care about. This represents lost revenue, lost money being pumped into the state, taxes on those revenues. Airline tickets, lodging, car rentals, licenses, gas, food, 2 dozen businesses you'll encounter on a trip, and outfitter and guide fees. You're not clearly looking at the impact this will have on the fish and game dept. You're not considering all the meat that gets donated to local shelters and needy indigenous communities. And your underestimating the ripple effect on other hunts aside from caribou. Hunters will just go somewhere else where hunting isnt being banned, somewhere they can combine multiple hunts. If we were already willing to travel to Alaska we could travel anywhere in in the world, hell brown bear and moose would be cheaper in just about any other country.

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

Proposal 3: Oppose



Name: Plecque, Jeffrey

Community of Residence: Redding

Submission Time: 1/13/2024 12:16:12 AM

Comment:

I am OPPOSED to proposals #3 and #38 for the following reasons:

Limited Impact of Non-Resident Hunting: Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

Subsistence Hunting Impact: The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

Precedent for Wildlife Management: The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing.

Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

Cultural and Recreational Loss: The closure would deny non-residents the cultural and recreational experience of hunting in this unique region.

Potential for Better Management Practices: Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability.

Need for Comprehensive Approach: Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

Please vote NO on Proposals #3 and 38. Thank you

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 445

Name: Pope, Mark

Community of Residence: Woodland Hills Utah

Submission Time: 1/2/2024 5:16:42 PM

Comment:

I strongly disagree with the proposal to deny non residents opportunities to hunt caribou on this unit. I believe you need to take a look at reducing resident tags. Non residents bring lots of funding to Alaska.

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

Proposal 3: Oppose



PC 446

Name: Pratchett, Terry

Community of Residence: Utah

Submission Time: 1/5/2024 9:31:16 PM

Comment:

I oppose the proposals to close caribou hunting to non residents. Non residents account for only 300 bulls harvested, which is a very small percentage of the total population. However, we contribute a disproportionate amount to the local economy.

Lastly, Please allow the professionals from the fish and game to manage the herd. They have the expertise and experience to oversee the management plan.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 447

Name: Pratt, Rylan

Community of Residence: Vermillion, SD

Submission Time: 1/6/2024 7:05:26 PM

Comment:

I Oppose proposals 3 and 38. As a nonresident of Alaska, I wish to hopefully hunt these regions in the future. Please, listen to wildlife biologists and the State game department as well as take into account the natural fluctuations of Mother Nature. By closing these regions, it opens the door to continuously close other regions for Caribou or other animals. Please keep my dream alive. Thank you.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 448

Name: Prsha, Chris

Community of Residence: La Mesa, California

Submission Time: 1/8/2024 12:45:28 AM

Comment:

Please keep caribou hunting open to non residents. I personally have not had the opportunity to hunt the area, but it is something I've wanted to do since I visited Alaska 10 years ago. The limited take is not affecting the overall population of the heard, and the little impact it may have is vastly outweighed by the economic contribution nonresident hunters bring to the area.

Thank you for taking the time to read this.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 449

Name: PSC OUTDOORS, LLC

Community of Residence: St. George, Utah

Submission Time: 1/3/2024 3:59:06 AM

Comment:

As an outfitter in Utah, it would be devastating to our business if our state denied access to non residents. As someone who personally has a dream to hunt caribou in Alaska one day, please do not deny access to non residents.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 450

Name: Pushkis, Mark

Community of Residence: Scottsdale, PA

Submission Time: 1/2/2024 10:49:16 PM

Comment:

I would like to stress my opposition to proposal 3. I'm an avid hunter and would love to experience a caribou hunt in Alaska. By not allowing non residents to hunt caribou, this will greatly affect my opportunity to fulfill this potentially once in a lifetime opportunity.

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

Proposal 3: Oppose



PC 451

Name: Quinn, Cadence

Community of Residence: West valley city utah

Submission Time: 1/9/2024 4:55:51 AM

Comment:

I am AGAINST proposal 3 and 38

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 452

Name: Quinn, Paul

Community of Residence: Coronado, California

Submission Time: 1/8/2024 10:03:48 PM

Comment:

Here are ten talking points on why proposals #3 and #38 should be opposed:

Limited Impact of Non-Resident Hunting: Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

Subsistence Hunting Impact: The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

Precedent for Wildlife Management: The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing.

Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

Cultural and Recreational Loss: The closure would deny non-residents the cultural and recreational experience of hunting in this unique region.

Potential for Better Management Practices: Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability.

Need for Comprehensive Approach: Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 453

Name: Quist, Adam

Community of Residence: Mcbain, MI

Submission Time: 1/5/2024 9:25:08 PM

Comment:

I am a hunter that has previously hunted unit 22 for caribou. I oppose proposal #3 & #38, non-resident hunters are not the issue for declining caribou numbers. As a non-residents, I am allowed 1 bull caribou with a premium price per tag versus resident hunters. which provides more money to the state of AK in addition to providing tourism and money spent in local business. Resident hunters are allowed 20 tags per year with no restriction of bull or cow. I am not sure what the rules are for Native/Inuit peoples? I also have just read an article stating more than 95% of caribou are killed by Alaskan residents. If changes are needed to help the caribou numbers, a change should focus on restricting the number of animals harvested by local residents and natives first. If hunting is closed to me a non resident the chances me visiting or spending money in local business is minimal. It also does not fix the declining caribou number either . So it would be a lose for the state of Alaska in multiple ways. Thank you for your time.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 454

Name: Radandt, Tom

Community of Residence: Libby, MT

Submission Time: 1/9/2024 3:12:42 AM

Comment:

I oppose proposals 3 and 38. Non resident hunters harvest very few animals compared to substance hunters. Eliminating non resident hunters will negatively impact rural economies but eliminating much needed income. There is no scientific information that supports the idea that non resident hunters are a limiting factor for caribou herds. For these reasons you must reject these proposals.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 455

Name: Rasimowicz, Steven

Community of Residence: Glen Gardner, NJ

Submission Time: 1/8/2024 5:32:28 PM

Comment:

I am specifically writing to oppose proposals #3 and #38 on the following grounds. Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves. The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle. There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population. Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation. The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest. The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing. Closing non-resident hunting could adversely affect local businesses and services that make their livelihood from these hunters, such as charter planes. The closure would deny non-residents the cultural and recreational experience of hunting in this unique region. Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability. Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 456

Name: Rauh, Nicholas

Community of Residence: Reno, NV

Submission Time: 1/8/2024 8:32:51 PM

Comment:

Eliminating nonresident hunting is a drastic overstep that would have detrimental effects on the state. The few nonresidents who hunt the state bring in a massive amount of funding for conservation, local communities, and Alaska residents.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 457

Name: Rauscher, Hoss

Community of Residence: Amarillo, TX

Submission Time: 1/8/2024 12:34:18 AM

Comment:

It is a life dream to hunt Caribou in Alaska. The wilderness and the challenge are magnetic and call me to be a better version of myself with the means and physical capabilities to complete such a hunt. Removing nonresident access to hunt Caribou removes my willingness or ability to have any investment in the matter at all. Why would I care at all about the status or health of the caribou population in Alaska if I am restricted from stewardship in any form? You may say “move to Alaska”, fair enough, however with a small population it seems a rather poor strategy to restrict skin in the game only to those who live in the state. Through shows like Meat Eater and others, young men and women who may never have cared about any wildlife in Alaska, now know the possibility of being able to achieve a something so awesome in a place so grand despite living somewhere as far away as a place like Amarillo, TX. Conservation and hunting are making amazing strides and Nonresident hunting is a huge part of that. Do not step in the way of that progress. Allow us to care and give us the opportunity to partake.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 458

Name: Ready, Steven

Community of Residence: Pender, NE

Submission Time: 1/3/2024 12:21:26 AM

Comment:

I oppose proposed closures on measures 3 and 38. These are not scientifically supported actions and do not benefit wildlife in any capacity. It merely gives a small population of people exclusive access to public land.

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

Proposal 3: Oppose



PC 459

Name: Reat, Matthew

Community of Residence: Seattle, WA

Submission Time: 1/13/2024 12:56:28 AM

Comment:

I would like to keep open the opportunity for non-residents to hunt caribou

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

Proposal 1: Support Proposal 2: Oppose Proposal 3: Oppose Proposal 4: Oppose
Proposal 38: Oppose



PC 460

Name: Reck, Jacob

Community of Residence: West Bend, WI

Submission Time: 1/9/2024 2:02:24 PM

Comment:

I do not agree with proposals 3 and 38. These non resident closures would be detrimental to many AK residents that rely on the non resident hunters for income. Plus shutting these areas down for non residents would potentially push those hunters to other parts of AK increasing the hunting pressure in the areas not closed in these proposals.

Many hunters from the lower 48 dream of hunting caribou once in their life and shutting down one of the historic premier areas does not solve the issues of over utilization of the caribou herds in those areas.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 461

Name: Reece, Jedediah

Community of Residence: Republic, Missouri

Submission Time: 1/8/2024 5:05:01 PM

Comment:

I am opposed to proposals 3 and 38. These are unfounded by scientific evidence, and as a nonresident who wishes to hunt here would be a detriment to my hunting and the money I would spend in the state of Alaska.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Reed, Trec

Community of Residence: Paul

Submission Time: 1/2/2024 3:11:34 AM

Comment:

Proposal 3: I believe that wildlife should be managed based on science and not politics. I have always admired Alaska for doing that when the lower 48 is straying from that model of management. Don't become like the lower 48. This seems more like a political move to keep residents happy than to actually help the declining population. From what I understand the Caribou population like most things is cyclical and will go through ups and downs every X number of years. I think if the population is declining the most logical place to reduce tags is from the residents who can kill 5 per day. Lower non resident tags if needed as well but don't eliminate them. I dream of coming to Alaska one day to hunt Caribou. I may never get to even if the law doesn't change. I support non residents hunting Alaska even if I never get to.

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

Proposal 1: Support Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Support Proposal 6: Support Proposal 7: Support Proposal 8: Support Proposal 10: Support Proposal 11: Support Proposal 12: Support Proposal 13: Support Proposal 14: Support Proposal 15: Support Proposal 16: Support Proposal 17: Support Proposal 18: Support Proposal 19: Support Proposal 20: Support Proposal 21: Support Proposal 22: Support Proposal 23: Support Proposal 24: Support Proposal 25: Support Proposal 26: Support Proposal 27: Support Proposal 28: Support Proposal 29: Support Proposal 30: Support Proposal 31: Support Proposal 32: Support Proposal 33 Support Proposal 34: Support Proposal 35: Support Proposal 36: Support Proposal 37: Support Proposal 38: Support Proposal 39: Support Proposal 40: Support Proposal 41: Support Proposal 42: Support



PC 463

Name: Reedy, Kyle

Community of Residence: Great Falls, MT

Submission Time: 1/5/2024 2:41:14 AM

Comment:

Hello,

I'm submitting my opposition for proposals 3 & 38. From the research I've read the western arctic caribou herd population goes through peaks and valleys. Which might be exacerbated due to the changing climate as we move forward. I'm also under the notion that nonresidents harvest ~250 caribou bulls only on an annual basis. While residents harvest 10-14k caribou per year and can harvest cows. If the game and fish doesn't limit cow harvest why would you even consider eliminating the opportunity of 250 bulls a year? Wildlife managers understand the removal of some males from a population has very little impact on overall population growth. I would also like to see population numbers increase but proposals 3 & 38 are not the answer. I hope you agree with me an oppose these as well.

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

Proposal 2: Support Proposal 3: Oppose
Support Proposal 38: Oppose

Proposal 36: Support Proposal 37:





PC 464

Name: Reid, Jason

Community of Residence: woodgate, ny

Submission Time: 1/13/2024 1:07:40 AM

Comment:

In regard to proposals 3 & 38 which will be discussed at the Western Arctic region meeting, I am opposed.

My basis for opposition is for the precedent for wildlife management this can lead to. The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions here and in other states without clear scientific backing. There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population. Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 465

Name: Reinbold, Rydell

Community of Residence: Belgrade, mt

Submission Time: 1/3/2024 3:18:29 PM

Comment:

Update maximum caliber to .260 not .243 is both proposals.

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

Proposal 1: Oppose Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Support Proposal 6: Oppose Proposal 7: Oppose Proposal 8: Oppose Proposal 10: Oppose Proposal 11: Oppose Proposal 13: Oppose Proposal 14: Support Proposal 15: Oppose Proposal 16: Support Proposal 17: Support Proposal 18: Support Proposal 19: Oppose Proposal 20: Support Proposal 21: Oppose Proposal 22: Support with Amendment Proposal 23: Support Proposal 24: Oppose Proposal 25: Oppose Proposal 26: Oppose Proposal 27: Support Proposal 28: Oppose Proposal 29: Support Proposal 30: Support Proposal 31: Support Proposal 32: Oppose Proposal 33 Support Proposal 34: Oppose Proposal 35: Support Proposal 36: Support Proposal 37: Support Proposal 38: Oppose Proposal 39: Oppose Proposal 40: Oppose Proposal 41: Oppose Proposal 42: Support



PC 466

Name: Remling, Roger

Community of Residence: Amarillo, Texas

Submission Time: 1/4/2024 9:34:21 PM

Comment:

Commenting on Proposal #3

In Opposition

To those Concerned with Sustainable and Ethical Caribou Hunting Practices in Alaska,

I hope this letter finds you well. I recently had the opportunity to experience an Alaskan hunting adventure, and I wanted to share some observations and concerns in the spirit of fostering positive and sustainable hunting practices.

During my trip, I was struck by the remarkable beauty of Alaska and the unique experience it offers to hunters. However, I couldn't help but hear stories about Caribou hunting practices that raised some ethical considerations. Understanding that hunting is an integral part of Alaska's culture and economy, I believe there is an opportunity to promote sustainable and ethical approaches.

I've come to appreciate the importance of responsible hunting, both for the preservation of wildlife populations and the overall integrity of the hunting experience. I wonder if there are initiatives or guidelines in place to ensure that hunting practices align with principles of sustainability and ethical treatment of wildlife.

I am particularly concerned about anecdotes I heard regarding the excessive pursuit of Caribou by some Alaskan residents using 4 wheelers and snowmobiles, with reported numbers reaching up to five per day. I believe it would be beneficial for Alaska to explore ways to balance hunting traditions with conservation efforts to ensure the long-term health of Caribou populations.

I'm aware of an upcoming proposal suggesting the exclusion of non-residents from hunting Caribou and would like to express my concerns regarding the potential adverse economic impact. My \$15,000 Caribou hunting experience in 2023 contributed significantly to the livelihoods of local outfitters, guides, airlines, and meat processors who provided their invaluable services. I had the privilege of interacting with individuals of the highest caliber throughout my trip, and I would be disheartened to witness their livelihoods affected by stringent regulations against non-resident hunters.

I appreciate your time, and I believe that your decision to vote against proposition 3 aligns with the goals of herd sustainability, ethical hunting practices, and the maintenance of a robust Alaska economy.

Thank you for your consideration.

Sincerely,

Roger Remling

Amarillo Texas

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

Proposal 3: Oppose



Name: Rensberger, Terry

Community of Residence: South Bend IN

Submission Time: 1/8/2024 9:23:24 PM

Comment:

I oppose proposals 38 & 3. Both lack scientific validity and will harm both non residents and local communities.

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

Proposal 1: Support with Amendment Proposal 2: Support with Amendment Proposal 3: Oppose
Proposal 4: Support with Amendment Proposal 5: Support with Amendment Proposal 6: Support
with Amendment Proposal 7: Support with Amendment Proposal 8: Support with Amendment
Proposal 10: Support with Amendment Proposal 11: Support with Amendment Proposal 12:
Support with Amendment Proposal 13: Support with Amendment Proposal 14: Support with
Amendment Proposal 15: Support with Amendment Proposal 16: Support with Amendment
Proposal 17: Support with Amendment Proposal 18: Support with Amendment Proposal 19:
Support with Amendment Proposal 20: Support with Amendment Proposal 21: Support with
Amendment Proposal 22: Support with Amendment Proposal 23: Support with Amendment
Proposal 24: Support with Amendment Proposal 25: Support with Amendment Proposal 26:
Support with Amendment Proposal 27: Support with Amendment Proposal 28: Support with
Amendment Proposal 29: Support with Amendment Proposal 30: Support with Amendment
Proposal 31: Support with Amendment Proposal 32: Support with Amendment Proposal 33:
Support with Amendment Proposal 34: Support with Amendment Proposal 35: Support with
Amendment Proposal 36: Support with Amendment Proposal 37: Support with Amendment
Proposal 38: Oppose Proposal 39: Support with Amendment Proposal 40: Support with
Amendment Proposal 41: Support with Amendment Proposal 42: Support with Amendment
Proposal 190: Support with Amendment Proposal 209: Support with Amendment



PC 468

Name: Resident Hunters of Alaska

Community of Residence: Fairbanks

Submission Time: 1/11/2024 12:20:57 AM

Comment:

see attached

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



RESIDENT HUNTERS OF ALASKA

unapologetically **FOR ALASKAN RESIDENTS**

Working hard to ensure our wildlife is managed sustainably with an emphasis on protecting and enhancing resident hunting opportunities!

www.residenthuntersofalaska.org

Resident Hunters of Alaska (RHAK)
Comments to Alaska Board of Game
Region V Western Arctic/Western Meeting
January 26 - 29, 2024

Proposals we support: 2, 10, 20, 36, 37, 39-41

Proposals we oppose: 1, 3, 12, 22, 28, 33, 34, 38

Proposal 1 – 5AAC 85.055 Hunting seasons and bag limits for Dall sheep

OPPOSE

The proponent of this proposal requests that if sheep hunting is again opened in Units 23 & 26A that it be an archery-only registration hunt opportunity for residents. (*note: Unit 26A is still open to sheep hunting opportunity*) His rationale is that bowhunters will take fewer sheep because archery-only hunts have less success rates than with rifles. He also claims that “archery-only hunting does not adversely affect opportunity in any way.”

We disagree that archery-only hunting does not adversely affect other hunting opportunities. Most hunters are not bowhunters, so this would adversely affect them by denying them the opportunity to hunt. While RHAK has many members who are bowhunters, we do not support new archery-only hunts unless they are in areas where weapons restrictions are necessary due to proximity to roads, public trails, or dwellings.

When game populations are low, we should not use “archery-only” hunting opportunity as a means to prevent overharvest by using a lower-success-rate weapon. If there are overharvest concerns, a limited registration hunt with a quota and reporting period is the proper means to address that.

Proposal 2 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Reduce the bag limit for taking caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C 24D, and 26A to four caribou per year, only one of which may be a cow

SUPPORT

There are situations when game populations are in decline that require resident hunting opportunity or the bag limit to be reduced in order to benefit recovery of the population. This should only happen after nonresident hunting opportunity or the bag limit has first been limited or restricted.

We fully support what we believe is a necessary reduction in resident bag limits for the declining Western Arctic Caribou Herd (WACH) that this proposal asks for, especially the recognition that the taking of cows needs to be strictly curtailed with the herd in decline. We know that this was not an easy decision for the WACH Working Group to submit this proposal to lower the bag limit for all resident hunters for a caribou population many depend upon to put food on the table. We thank them for putting the caribou resource first with this proposal.

Proposal 3 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Close all nonresident caribou hunting throughout the Western Arctic Caribou **Herd's range**

OPPOSE

We understand that the WACH Working Group, in submitting proposal 2 to lower the WACH bag limit for all resident hunters, wanted nonresident hunters to bear the brunt of any new restrictions on residents. And normally, we would agree. But with the nonresident WACH bag limit already at one bull, the federal land closures that restrict all nonresident caribou hunters, and the nonresident annual harvest accounting for only 2-3% of the total harvest, we do not believe it is necessary at this time to further restrict nonresident caribou hunters.

Proposal 12 – 5AAC 92.085 Unlawful methods of taking big game

Establish a minimum caliber requirement for hunting moose in Unit 18

OPPOSE

Alaska does not have a standard minimum caliber requirement for taking big game, other than for bison, which requires the hunter to use a cartridge that fires a minimum of a 175-grain bullet having a minimum of 2,800 ft/lb energy at the muzzle.

The prevalence and use of various rifles chambered for .223/5.56 in Alaska is extensive, and imposing a minimum caliber for moose that would preclude the use of .223/5.56-chambered rifles would lead to a cost for many hunters in having to acquire a new rifle that meets the new minimum requirements.

Hunting ethics, including the choice of caliber of weapon, is a personal decision. Some may believe that it is unethical to use a .223/5.56-caliber weapon for hunting moose. It is their choice if they want to use a larger caliber.

Shot placement and bullet choice are the most important aspect of ethically harvesting a moose. A good shot from a rifle chambered for .223/5.56 will lead to a successful and ethical moose harvest. A bad shot from that same rifle, *or any other caliber rifle*, can lead to wounding loss that the proponent of this proposal seeks to curtail.

Proposal 20 – 5AAC 85.050 Hunting seasons and bag limits for muskoxen

Change the bag limit for Tier II muskox hunts in Unit 22 to one muskox every two years

SUPPORT

The state Tier permit system is necessary when game populations are low and hunting needs to be limited. And overall, it works well to prioritize hunting opportunities for those who live in the area and have a history of hunting a specific game population. But in certain circumstances, as with these few Tier II muskox permit hunts, it is unfairly precluding some local residents from ever winning a permit. By moving to a one-every-two-years Tier II muskox hunt, longtime residents who have been unable to score high enough to get a permit will have a better chance at an opportunity to hunt, while still providing opportunity for those in the area longer.

Proposal 22 – 5AAC 92.085 Unlawful methods of taking big game; exceptions

Establish a minimum caliber for moose hunting in Unit 22A and portion of 22B

OPPOSE

See our comments on proposal 12

Proposal 26 – 5AAC 85.045 Hunting seasons and bag limits for moose

Lengthen DM855 nonresident moose hunting season in Unit 22E by two weeks

OPPOSE

There are 10 total nonresident DM855 moose permits available, and the season is currently two weeks long. The proponent of this proposal states that most of these nonresident hunters have contracted with a guide and is asking for doubling the length of the season **because there are too many guides creating “competitive hunting practices.”**

What “competitive hunting practices” are exactly is not defined. But essentially, this proposal highlights something that should be the purview of the Big Game Commercial Services Board – that regulates guides – if he believes there are too many guides in the area causing conflicts or other problems.

The issue of too many guides in an area, which causes conflicts or other problems, is certainly very real, but is not a valid reason to increase nonresident guided hunt opportunities or seasons. Increasing the nonresident season two weeks in August would also impact resident hunters who are in the field during the resident season.

Proposal 33 – 5AAC 85.055 Hunting seasons and bag limits for sheep

Reduce the Unit 26A sheep bag limit for residents to one ram with full-curl horn or larger every four years

OPPOSE

The proponents of this proposal state that Dall sheep populations are down across the state, sub-legal harvests are up, and if the current sheep hunting pressure in Unit 26A is allowed to continue the board will be forced to implement sheep hunting restrictions for everyone.

Under current sheep hunting regulations for Unit 26A, residents can hunt every year, and nonresidents can hunt every four years. There are no limits on the number of sheep hunters, but sheep hunting in this part of the Brooks Range is extremely limited to just a few areas. This is obvious from looking at the sheep hunting and harvest statistics.

For the past five years data is available, from 2018 - 2022, this is what the ADFG Unit 26A harvest statistics show:

- 2018 – 1 resident & 3 nonresident sheep hunters, zero sheep harvested
- 2019 – 3 resident & 0 nonresident sheep hunters, zero sheep harvested
- 2020 – 1 resident & 0 nonresident sheep hunters, zero sheep harvested
- 2021 – 4 resident & 3 nonresident sheep hunters, zero sheep harvested
- 2022 – 3 resident & 1 nonresident sheep hunters, 2 sheep harvested (1 by resident and 1 by nonresident)

There were only two sheep harvested in that five-year span, one by a resident and one by a nonresident, and on average over that same period there have only been 4 sheep hunters in the field each year in Unit 26A under the general GS000 harvest ticket. Yet the proponents of this proposal (all guides) seek to reduce resident sheep hunting opportunity to one every four years *"in order to create an overall enjoyable hunting experience and keep Dall sheep from going to a draw statewide and more importantly to keep sheep on the mountain...."*

This proposal highlights the fact that with sheep in this unit so low, recovery seemingly doubtful, somehow, we still allow over-the-counter nonresident hunting opportunity.

See harvest statistics below:

Interim Reports GS000 Sheep - Year 2018 Unit 26A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	0	0% <i>0% of all overlays</i>	1	100% <i>100% of all overlays</i>	0	0%	1	100%
Non Res	0	0% <i>0% of all overlays</i>	3	100% <i>100% of all overlays</i>	0	0%	3	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	0	0%	4	100%	0	0%	4	100%

Interim Reports GS000 Sheep - Year 2019 Unit 26A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	0	0% <i>0% of all overlays</i>	3	100% <i>100% of all overlays</i>	0	0%	3	100%
Non Res	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	0	0%	3	100%	0	0%	3	100%

Interim Reports GS000 Sheep - Year 2020 Unit 26A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	0	0% <i>0% of all overlays</i>	1	100% <i>100% of all overlays</i>	0	0%	1	100%
Non Res	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	0	0%	1	100%	0	0%	1	100%

Interim Reports GS000 Sheep - Year 2021 Unit 26A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	0	0% <i>0% of all overlays</i>	4	100% <i>100% of all overlays</i>	0	0%	4	100%
Non Res	0	0% <i>0% of all overlays</i>	3	100% <i>100% of all overlays</i>	0	0%	3	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	0	0%	7	100%	0	0%	7	100%

Interim Reports GS000 Sheep - Year 2022 Unit 26A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	1	33.3% <i>33.3% of all overlays</i>	2	66.7% <i>66.7% of all overlays</i>	0	0%	3	100%
Non Res	1	100% <i>100% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	1	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	2	50%	2	50%	0	0%	4	100%

Proposal 36 & 37 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Reduce caribou bag limit for residents in Unit 23 to four caribou per year, only one of which may be a cow

SUPPORT

See our comments on proposal 2

Proposal 38 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Close all nonresident caribou hunting in Unit 23

OPPOSE

See our comments on proposal 3

Proposal 39, 40, & 41 – 5AAC 85.020 Hunting seasons and bag limits for brown bear

Lengthen the brown bear season in Unit 23 for residents to no closed season

SUPPORT

We support these proposals based on the Department’s comments on them below:

"The department SUPPORTS this proposal to increase opportunity because a substantial increase is not expected from the proposed season expansion and there is no conservation concern for the bear population in Unit 23. Extending the season will also give residents the opportunity to harvest bears that would otherwise be taken in DLP. The department will also monitor any increase in harvest for potential conservation concerns."

Thank you to Board of Game members for your service, and as always, thanks to Board Support and Department staff.

Mark Richards
Executive Director Resident Hunters of Alaska



PC 469

Name: Retterath, Brady

Community of Residence: Sheridan Wyoming

Submission Time: 1/7/2024 11:39:38 PM

Comment:

Please consider opposing proposal 3 and 38 so I can take my kids hunting there very soon. This is a place they have talked about for a longtime going hunting just like I did when I was younger

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 470

Name: Reynolds, Kenneth

Community of Residence: Ridgefield, Washington

Submission Time: 1/4/2024 12:14:54 AM

Comment:

Greetings,

My name is Ken Reynolds and I'm writing to protest the changes made to Caribou hunting for the west Arctic herd. I have personally hunted for Caribou as a nonresident in 2020&2023. I utilized a transport service out of Kotzebue. The price of these hunts have gone up substantially with the initial closing of federal land, pricing out people for nonguided Alaska adventures that an average person could save for and do. The cost doubled from when I saved for it in 2020-2023 because transporters were required to fly further to get to access federal lands.

I harvested the meat and took it home so that my family could organic free range meat. Hunting has been a large part of my life and an activity that I wish to pass on to my children. However it gets more difficult every year as regulations change and access becomes more difficult to secure.

Regarding the changes proposed I feel that rules are already in place that limit harvest while allowing opportunity to nonresidents. Nonresident hunters are required to take male caribou, and the amount of caribou taken by nonresident hunters is minuscule (under 300 a year) Closure of federal lands and potentially entire units to nonresident hunters is not based on science but is based on emotion.

I am opposed to any attempt at a nonresident closure of caribou hunting. It is punitive in nature.

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

Proposal 3: Oppose Proposal 4: Support Proposal 5: Oppose



PC 471

Name: Riatti, Dave

Community of Residence: Frisco, TX

Submission Time: 1/8/2024 5:23:47 PM

Comment:

I do not support proposals 3 and 38 due to the below reasons.

Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

And finally

The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

Thanks,

Dave

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 472

Name: Riatti, Gray

Community of Residence: Dallas tx

Submission Time: 1/5/2024 8:44:26 PM

Comment:

I oppose proposals 3 and 38. This doesn't sound like science based evidence but a social opposition to non resident hunters. Caribou herds are cynical and weather and predators are more of a factor to declines than non resident hunters who only take a minimal amount of bulls off the landscape. If anything remove all cow tags and only allow for the hunting of bulls. Predators need to be managed better as well

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 473

Name: Rich, Kyle

Community of Residence: Cardwell Montana

Submission Time: 1/7/2024 4:29:26 AM

Comment:

In my opinion, this will only make matters worse. the first thing that comes to my mind is when something value becomes scarce in this case Caribou hunting, the areas, still available to nonresident hunting, will become overhunted or a gambling match to even get a license, which in turn puts hunting at risk, not only for my generation, but for my future children, and for my grandchildren. I hope this comment is a value.

Sincerely, Kyle Rich.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 474

Name: Richardson, Casey

Community of Residence: Huson, MT

Submission Time: 1/2/2024 5:47:21 AM

Comment:

Closing caribou hunting to nonresident while allowing a 5 plus caribou harvest a day or even a 4 or 5 bag limit for residents doesn't make any biological sense. Please consider the recommendations of your caribou working group

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

Proposal 3: Oppose



PC 475

Name: Richardson, Nora

Community of Residence: Mineral, VA

Submission Time: 1/9/2024 12:39:28 PM

Comment:

Limited Impact of Non-Resident Hunting: Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

Subsistence Hunting Impact: The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

Precedent for Wildlife Management: The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing.

Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

Cultural and Recreational Loss: The closure would deny non-residents the cultural and recreational experience of hunting in this unique region.

Potential for Better Management Practices: Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability.

Need for Comprehensive Approach: Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

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

Proposal 1: Support Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Support Proposal 6: Support Proposal 8: Support Proposal 10: Support Proposal 11: Support Proposal 12: Support Proposal 13: Support Proposal 14: Support Proposal 15: Support Proposal

16: Support Proposal 17: Support Proposal 18: Support Proposal 19: Support Proposal 20:
Support Proposal 21: Support Proposal 22: Support Proposal 23: Support Proposal 24: Support
Proposal 25: Support Proposal 26: Support Proposal 27: Support Proposal 28: Support Proposal
29: Support Proposal 30: Support Proposal 31: Support Proposal 32: Support Proposal 33
Support Proposal 34: Support Proposal 35: Support Proposal 36: Support Proposal 37: Support
Proposal 38: Oppose Proposal 39: Support Proposal 40: Support Proposal 41: Support Proposal
42: Support Proposal 190: Support



PC 476

Name: RICHMOND, PAULA

Community of Residence: BEAVER, UTAH

Submission Time: 1/5/2024 10:16:39 PM

Comment:

My thoughts regarding Proposal #3 which requests the entire closure of non-resident caribou opportunities in units 22, 23, 24C, 24D, 26A, and portions of 21D and 24B are not in support of the proposed closure.

Same with Proposal #38 which requests the closure of unit 23 for all non-resident caribou hunting seasons. I do not support the requested closure.

Looking at the data, there is not enough take of caribou by non-residents to negatively affect the population of the herd.

Thank you for your time and consideration.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 477

Name: Ridder, Christopher

Community of Residence: Kearney, NE

Submission Time: 1/4/2024 5:09:59 PM

Comment:

To whom this may concern,

I am strongly in opposition toward proposals #3 and 38 regarding the closure of non-resident hunting for Caribou across the NW region of Alaska.

As has been cited at nauseum by numerous scientific papers and studies, the impact of non-resident hunting of bull Caribou does not significantly impact the herd, nor does the pressure of non-resident hunters substantially influence migration behavior.

The nearly unrestricted harvest by subsistence hunters with very liberal daily harvest limits and open seasons for cow/calf harvest while being aided by snow machines and other off road vehicles however has proven to be substantially detrimental to migration patterns and population recovery rates.

If a change in harvest habits is to be made, it should be made to reduce the potential impact of subsistence hunting (such as from 5 of either sex to up to 2 and no more than one cow/calf per day) and reducing the harvest window for cow/calf Caribou to less than 6 months of the year. While I appreciate the right and need for subsistence hunting in remote reaches of Alaska, the relative lack of control over this harvest and pitting the non-resident hunting (and resulting economic stimulus of non-resident hunting expenses) exacerbates the cyclical fluctuations of the Caribou population and needlessly vilifies the actual positive multiplier of non resident hunting and conservation actions.

Respectfully,

Christopher J Ridder

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 478

Name: Rideout, Jay

Community of Residence: Eau Claire, Wisconsin

Submission Time: 1/3/2024 2:45:30 AM

Comment:

I oppose proposal #3 which would close the caribou season to non-residents. As a non resident that has never caribou i have had no negative impact on the herd to date. That said I have always dreamed of a fly in drop camp to hunt these incredible animals. In fact I had a trip booked for last fall that was postponed due to the last closure. The trip was for myself, my brother and my dad who is now in his mid sixties. My dad's hunting trips are numbered due to age and this closure takes the one caribou hunt of his hunting career away from him. I am a firm believer in conservation but hunters, including non resident hunters, are conservation. To let locals kill 5 caribou a season while shutting out non residents is unreasonable and will not help the herd recover. Please do not close the season again. Thank you for considering.

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

Proposal 3: Oppose



PC 479

Name: Rideout, Jay

Community of Residence: Eau Claire, WI

Submission Time: 1/7/2024 2:09:39 AM

Comment:

Closing public land to non resident hunting is not conservation and not appropriate especially when resident are allowed to kill 5 caribou per year. If you/ they want to save the herd reduce resident limits to 1 per year and allow non residents 1 per year. Seems fair and continues to provide revenue to the Outfitters who typically are residents. Cutting your left leg off hoping your right leg gets bigger is not the best idea.

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

Proposal 38: Oppose



PC 480

Name: Riley, Rebekah

Community of Residence: Wasilla, Alaska

Submission Time: 1/12/2024 4:11:41 AM

Comment:

I am in support of Proposal 6, 5 AAC 85.025: Closing the Mulchatna Herd in Unit 18 for 5-10 years to hunting in order to allow the Herd to rebuild.

This proposal from a local resident of the area indicates local support from those who know the area and are direct users of the resources it provides. I trust the local instinct of what is best for the resources in their Great Land communities and surroundings.

I believe that it is FAR less expensive and FAR less controversial to allow natural management during the proposed hunting moratorium. This local proposal, if passed, is an opportunity for the BOG and locals to study the outcomes of the moratorium and make better informed future decisions on management of the Herd in the future.

I believe this proposal can and will prove to be a successful management tool for use not only for the Mulchatna Herd but also one that may prove to be useful for other wildlife management practices in the State.



PC 481

Name: Rob, Peter

Community of Residence: Nome, AK

Submission Time: 1/12/2024 7:07:23 PM

Comment:

PROPOSAL 21 OPPOSED

I am opposed to this proposal.

This proposal to harvest cow muskox from August 1 through October 31 seems ill advised to me.

The chances of harvesting lactating cows that are nursing calves are high, resulting in orphaned calves. It is not easy to determine which calf belongs to which cow in a group, especially when the group feels threatened and bunches up. It sets a bad precedent to set up a system to harvest nursing females and to orphan calves.

Muskox nurse their calves into the winter and provide security, food and parental education. Orphaned calves would miss out on these benefits and fall victim to older herd members chasing them from food sources, especially as winter gets harsh and food more inaccessible.

The inner wool of the muskox, the quiviut, is a valuable secondary benefit of the harvest of muskoxen if the animal is harvested at an appropriate time of year. Muskox shed their quiviut in late spring and early summer and the hide loses its value during the proposed August 1 to October 31 cow season.

Since 1995, I have lived in the Nome River valley about 12 miles to the north of Nome. Muskox have been a fascinating and enjoyable presence here for this entire time. I am dismayed that the proposed harvest level for Unit 22C has significantly increased to 30 animals and is entirely within areas TX095 and TX095. Departmental comments describe this as an effort to discourage muskoxen from within the Nome City Limits. If the intent is to discourage muskox from within the Nome City Limits, then that is where the harvest should be concentrated. The result of harvesting outside the city limits, but still within areas TX095 and TX096, may be to encourage muskox to move into the city limits.

Thank you for your work on these issues.

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

Proposal 21: Oppose



PC 482

Name: Robb, Kalla

Community of Residence: Lebanon nh

Submission Time: 1/9/2024 1:08:07 PM

Comment:

This is lacking in fact bases data and it will limit money and trips many people who have niver been to alaska who want to go and spend money.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 483

Name: Robinson, Darin

Community of Residence: MONROE, Utah

Submission Time: 1/13/2024 4:51:39 AM

Comment:

Proposal 3: Opposed because the proposal significantly reduces opportunities for non-resident caribou hunting on public lands. I view public lands and the wild game that reside there in any/all States of the Nation a resource that should be available to any resident of the USA.

Proposal 16 & 17: Reducing predators is a good idea and is necessary to help struggling herds recover.

Proposal 25: Once again, non-residents who are residents of the USA should have access to hunt wildlife on public lands in all States of the Nation.

Proposal 38: Opposed to eliminating non-residents hunting opportunities.

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

Proposal 3: Oppose Proposal 16: Support Proposal 17: Support Proposal 25: Oppose
Proposal 28: Support Proposal 38: Oppose Proposal 42: Support



PC 484

Name: Robinson, Garrett

Community of Residence: Stafford, Virginia

Submission Time: 1/9/2024 12:52:53 AM

Comment:

The below is my comment in respect to proposals #3 and #38.

Limited Impact of Non-Resident Hunting: Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

Subsistence Hunting Impact: The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

Precedent for Wildlife Management: The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing.

Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

Cultural and Recreational Loss: The closure would deny non-residents the cultural and recreational experience of hunting in this unique region.

Potential for Better Management Practices: Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability.

Need for Comprehensive Approach: Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

As a veteran who spent a week in the field with 10 other veterans hunting caribou, most of us for the first time, I was awe struck by this landscape. To the point that I along with several others from our group have already begun plans for future trips in the years to come.

The loss of such an opportunity without sound science to support such changes is disappointing to say the least. I am proud of our Nation's support to the North American Model of Conservation. Throughout my 26 years in the Marine Corps I served many of those years

overseas. I have witnessed first hand what happens when you do not follow such a model and make decisions based on emotion or popularity.

I hope my service along with my fellow service members, past and present, protecting a way of life, which includes the North American Model of Conservation was/is not in vain.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 485

Name: Robinson, Trevor

Community of Residence: Soldotna, Alaska

Submission Time: 1/13/2024 7:31:18 AM

Comment:

Proposal 3: Oppose.

Non-residents only take a small percentage of the animals (caribou in the area) State of Alaska only says 5%. The biology also states that animals harvested in these areas is insignificant. If it is insignificant there should be no reason non-residents should not have access to the animals. Subsistence hunters report "competition" with non-residents. This however is always part of hunting. Fluctuating population, predation, disease, weather, and more all are "competition to the subsistence hunters in Alaska. It is all part of taking of wild game. I oppose proposal 3 for these reasons.

Proposal 5: Oppose.

I oppose proposal 5 due to the quota of 400 animals. I do agree with reducing harvest numbers for residents. There does not need to be a bag limit of 5 Caribou per day. I also support cows not being harvested. This will only help the herds keep a sustainable number for future. Until nonresident are negatively affecting the population no action should be taken. It was stated that the highest number of animals taken by non-residents since 2012 was 374. On the highest harvest year it was still below the quota. There is no reason for a quota if numbers are not being exceeded.

Proposal 15: Oppose.

I oppose this proposal because population does not support having harvests in the unit. As soon as the numbers support a harvest it should be opened for a draw hunt open for any resident of Alaska.

Proposal 25: Oppose

I oppose the proposal. Only because non-residents only take <1% of the animals during the hunt and make up less than 2% of the hunters. That is a 50% success rate for these hunters. If there is on average 1 moose taken from the unit by a non-resident. Especially if the numbers are sustainable.

Proposal 37: Support.

I support the proposal. This is because it is found to be biologically beneficial to the herd. This will allow the herd to grow to sustainable numbers.

Proposal 38: Oppose.

I oppose the proposal. It does not biologically make sense to close it to non-residents. They only harvest 5% of the animals in the unit. Also, bull to cow ratios support more bulls to be taken. I oppose and so does the biology of the herd.

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

Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Support with
Amendment Proposal 7: Oppose Proposal 12: Oppose Proposal 15: Oppose Proposal 16:
Support Proposal 17: Support Proposal 25: Oppose Proposal 28: Support Proposal 29:
Support Proposal 33: Oppose Proposal 34: Support Proposal 36: Support Proposal 37: Support
Proposal 38: Oppose Proposal 39: Support Proposal 40: Support Proposal 41: Support Proposal
42: Support Proposal 190: Support



Name: Rohr, Jon

Community of Residence: Milwaukee, WI

Submission Time: 1/8/2024 9:42:43 PM

Comment:

I oppose proposals 3 and 38 as it greatly affects opportunities for non-residents. They would result in one of the most widespread losses of hunting opportunities for non-residents that the state has ever seen — with little evidence to support it. Here's why:

Limited Impact of Non-Resident Hunting: Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

Subsistence Hunting Impact: The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

Precedent for Wildlife Management: The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing.

Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

Cultural and Recreational Loss: The closure would deny non-residents the cultural and recreational experience of hunting in this unique region.

Potential for Better Management Practices: Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability.

Need for Comprehensive Approach: Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Rold, Caleb

Community of Residence: Palmer, AK

Submission Time: 1/3/2024 5:02:59 PM

Comment:

These proposals make no sense.

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

Proposal 1: Oppose Proposal 2: Oppose Proposal 3: Oppose Proposal 4: Oppose Proposal 5:
Oppose Proposal 6: Oppose Proposal 7: Oppose Proposal 8: Oppose Proposal 10: Oppose
Proposal 11: Oppose Proposal 12: Oppose Proposal 13: Oppose Proposal 14: Oppose Proposal
15: Oppose Proposal 16: Oppose Proposal 17: Oppose Proposal 18: Oppose Proposal 19: Oppose
Proposal 20: Oppose Proposal 21: Oppose Proposal 22: Oppose Proposal 23: Oppose Proposal
24: Oppose Proposal 25: Oppose Proposal 26: Oppose Proposal 27: Oppose Proposal 28: Oppose
Proposal 29: Oppose Proposal 30: Oppose Proposal 31: Oppose Proposal 32: Oppose Proposal
33: Oppose Proposal 34: Oppose Proposal 35: Oppose Proposal 36: Oppose Proposal 37: Oppose
Proposal 38: Oppose Proposal 39: Oppose Proposal 40: Oppose Proposal 41: Oppose Proposal
42: Oppose



PC 488

Name: Romano, Patrick

Community of Residence: Reno, NV

Submission Time: 1/4/2024 12:50:02 AM

Comment:

I oppose proposal #3 and #38. Closing units to nonresident hunting will have no impact on total herd health, will eliminate the ability for shared use of the land, hurt the outfitters who provide services to hunters, and hurt the Alaskan economy as a whole. Only 0.19% of the herd is harvested by nonresidents and those are mature males who are likely near the end of their life already, rearing females are what support the population. This is a blatant anti hunting attack not supported by science or facts.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Ronsman, Chase

Community of Residence: Talkeetna, AK

Submission Time: 1/3/2024 4:20:29 AM

Comment:

I oppose Proposal #3 for the Western Arctic/Western Arctic Region: to eliminate non-resident caribou hunting opportunities in GMU 21, 22, 23, 24 & 26.

I oppose this proposal for multiple reasons:

- 1) This proposal will reduce significant income for the entire state of Alaska, including for numerous businesses and individuals that include outfitters, transporters, and local commerce/supply stores/lodging. This income also supports resource awareness and conservation for the entire state.
- 2) The data presented is skewed against non-residents because the graphical representation specifically does not also depict resident hunters & resident harvest numbers - demonstrating bias in the current proposed argument.
- 3) The proposal does not consider other options, such as reducing resident harvest (currently allowed at 5 caribou PER DAY with no sex restriction) or restricting to male harvest only - and specifically does not restrict this to only subsistence hunting either.
- 4) The proposal states that only 5% of harvests come from non-residents and the reasons for non-resident elimination of season is due to a perceived hardship/disruption that non-resident hunters cause. These two statements go directly against each other, especially considering the non-resident season is only 1-2 months of the year while resident take is allowed year round in some instances.
- 5) We as a community need to find better answers to all work together and share a resource we all love rather than to eliminate one group's access altogether. That could mean reducing resident harvest numbers or restricting to male harvest, or it could be a 1 in 4 years harvest for non residents, or as a last resort it could even be instituting a draw for nonresidents. The complete elimination of non-resident hunting opportunities is one sided and risks further deterioration of our shared resources.

Thank you for your time and consideration of this statement and for the work you do in the preservation of one of our states greatest resource.

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

Proposal 3: Oppose



PC 490

Name: Rose, Chandler

Community of Residence: San Angelo, TX

Submission Time: 1/3/2024 4:25:50 AM

Comment:

Please do not pass this proposal. It goes against the North American Model of Wildlife Conservation. As a nonresident to Alaska, it is a dream of mine to come to your state and hunt Caribou. I fear that if this opportunity is taken away for me and other non-residents OK to any extent that the snow Missouri opportunity may never come back again. If we look at other states and their management if we've learned anything, it's that drastic majors such as this proposal are slippery slope to taking away hunting rights.

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

Proposal 3: Oppose



PC 491

Name: Rosenthal, Alex

Community of Residence: Carson City

Submission Time: 1/13/2024 12:01:49 AM

Comment:

I oppose Proposals 3 and 38. Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation. Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves. There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population. These proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 492

Name: Ross, Kelsey

Community of Residence: Camano, WA

Submission Time: 1/8/2024 9:30:48 PM

Comment:

I am asking you to reject proposals 3 and 38 to looking to limit non-resident caribou hunting.

One of my family's biggest dreams is to hunt caribou in Alaska in the near future. Although we aren't residents we have lineage and connection to the state, with many direct relatives on Wrangell Island, Anchorage and Fairbanks. We hunt here in Washington are seeking more hunting and food acquisition opportunities outside of our state.

It is ridiculous to limit non-resident opportunity when we have very little impact on the overall population. There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population. Non resident hunters do provide economic benefits through purchasing of tags that go towards wildlife management resources. Not to mention adversely affect local businesses and services that cater to these hunters, such as charter services from the money we spend while visiting your beloved state.

Anti-hunters are on a war path across this nation. We are seeing the affects of it here in WA and it's spreading. A closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing. The closure would deny non-residents the cultural and recreational experience of hunting in this unique region and incredible species. For us this is important due to having heritage and lineage in your state.

Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability. Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 493

Name: Ross, Mark

Community of Residence: Alliance Ne

Submission Time: 1/13/2024 4:18:35 AM

Comment:

Please do not stop nonresident caribou hunting on proposals 3 and 38. Nonresident hunting of caribou is a small minute percentage of caribou harvest . Caribou population reduction could be a natural cycle or a high population of predators.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 494

Name: Rusch, Ben

Community of Residence: Clinton,WA

Submission Time: 1/12/2024 8:40:18 PM

Comment:

Proposal #3 - Oppose - I am opposing proposal #3 due to a lack of scientific based decision making and no long-term strategy or plan for the impacts of the closure to all groups involved. I do not support rash, off-the-cuff decision making.

Proposal #38 - Oppose - Non-resident hunters make up a insignificant portion of the caribou take each year. Limiting non-resident participation will hurt the Alaska wildlife in the long run due to a lack of support from the lower 48 states.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 495

Name: Russell, Calder

Community of Residence: Appleton

Submission Time: 1/13/2024 3:22:04 AM

Comment:

I oppose #3 and #38. I don't feel it has been Fully thought through.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 496

Name: Russell, KarenFay

Community of Residence: Breinigsville, PA

Submission Time: 1/2/2024 8:30:40 PM

Comment:

Proposal #3 OPPOSED

There is historical evidence there is a large oscillating swing every 25+ years What may initially appear to be a steep decline is also part of a predicted downswing. What has also become more prevalent is the impact of predation and global warming.

Resident hunters have not seen a reduction in harvest limits, and Non-residents were reduced from 5 caribou to one bull caribou back in 2015 with a reduction in season. There is nothing left for the Non-residents to sacrifice.

Non-residents bring revenue into Alaska and Nome plus the cost of licensing, locking tags, lodging, meals and entertainment it is undeniable non-resident hunters have a positive impact on Alaska and rural village economics.

This proposed closure does not take into consideration or allow enough time for people who have committed to hunting the 2024 caribou season time to recover travel and guiding expenses.

Proposal #28 Change the Unit 22D and 22E nonresident brown bear to a general season hunt.

Recommending changing drawing tag DB690 to an over -the counter tag beginning August 1 2024.

Non-residents: Unit 22 D/E - One bear every regulatory year (By Permit) August 1-June 15.

The brown bear population in Unit 22D and Unit 22E has been increasing and the harvest is low.

Changing from a draw to an over-the-counter tag would allow more non-residents to purchase a metal locking tag and hunt for brown bears in Unit 22D and Unit 22E.

This increases revenue for state of Alaska and the local area, also potentially increases the harvest of more brown bears by guided non-residents.

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

Proposal 3: Oppose

Proposal 28: Oppose



PC 497

Name: Rutherford, Jordan

Community of Residence: Pagosa Springs, Colorado

Submission Time: 1/13/2024 12:22:09 AM

Comment:

Hunting is a very valuable revenue source to Alaska Residents. If caribou hunting is restricted, there will be millions of dollars that stop going into Alaska via tags, taxes, purchase of food, equipment, etc.

If you want to help the caribou, harvest more wolves. Make helicopter use legal for hunting. I have personally seen more than 30 caribou slaughtered by wolves -most of the caribou carcasses were wasted and left rather than consumed by the wolves.

Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves.

Natural Population Fluctuations: The Western Arctic Herd has historically undergone significant population fluctuations, suggesting that the current decline might be part of a natural cycle.

Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

Conservation through Hunting: Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation.

Subsistence Hunting Impact: The proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

Precedent for Wildlife Management: The closure could set a concerning precedent for wildlife management, potentially leading to more extensive restrictions without clear scientific backing.

Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

Cultural and Recreational Loss: The closure would deny non-residents the cultural and recreational experience of hunting in this unique region.

Potential for Better Management Practices: Instead of outright closure, improved management practices and regulations could be a more effective approach to ensuring the herd's sustainability.

Need for Comprehensive Approach: Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations.

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

Proposal 2: Oppose Proposal 3: Oppose
Oppose Proposal 38: Oppose

Proposal 36: Oppose Proposal 37:



PC 498

Name: Rutz, Matt

Community of Residence: Central Point, OR

Submission Time: 1/11/2024 8:47:27 PM

Comment:

I appose these recent Proposals to shut down and restrict the non residents ability to pursue and hunt caribou in Alaska. The numbers show that less than 300 caribou have been taken from non resident hunters within the last 3 years. There is no data that shows that non residents should be restricted. Proposals 3, 5, 15, 20, 23, 25 and 36-38

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

Proposal 3: Oppose Proposal 5: Oppose Proposal 15: Oppose Proposal 20: Oppose
Proposal 23: Oppose Proposal 25: Oppose Proposal 36: Oppose Proposal 37: Oppose
Proposal 38: Oppose



PC 499

Name: Ryan, John

Community of Residence: Santee

Submission Time: 1/9/2024 6:57:18 AM

Comment:

Don't give up public hunting

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 500

Name: Ryan, John

Community of Residence: Santee ,ca

Submission Time: 1/13/2024 4:14:33 AM

Comment:

Please don't close no residence caribou hunting anywhere

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

Proposal 3: Oppose

Proposal 38: Oppose
