



PC 001

Name: Abul-Ella, Dany

Community of Residence: Chilliwack, BC

Submission Time: 1/8/2024 5:47:34 PM

Comment:

I oppose the planned closures on non-resident caribou hunting, as there is little evidence for a positive impact on herds.

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 002

Name: Ackerman, Wesley

Community of Residence: Clinton, NC

Submission Time: 1/6/2024 3:21:32 PM

Comment:

Proposal 3 & 38:

Please don't limit the ability of non-residents to enjoy the vastness of your majestic state! I imagine this brings more income for conservation also!



PC 003

Name: Adkins, Jason

Community of Residence: Winfield, WV

Submission Time: 1/3/2024 3:21:19 AM

Comment:

NO! On 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 004

Name: Ahmasuk, Austin

Community of Residence: Palmer, AK

Submission Time: 1/13/2024 3:05:42 AM

Comment:

I am a lifelong hunter, trapper, fisher from Nome I support Proposal 23 to revise the ANS for moose in GMU 22. The Board of Game enacted regulations at 5AAC 99.025 and that regulation claims that a comprehensive evaluation of the Amount Necessary for Subsistence (ANS) for moose in Unit 22 has been conducted. 5AAC 99.025 is supposed to be comprehensive, offering a detailed analysis of the amount of moose required to satisfy subsistence needs. The current ANS is NOT comprehensive and fails the public's test. Members of the public have proposed changes to the ANS for moose in GMU 22 numerous times because.

Each time the Board of Game considered moose ANS proposals for Unit 22 they have been rejected based on political reasons and not scientific or based on rule of law. The existing ANS for moose in Unit 22 is fundamentally flawed because the Board of Game has failed in its public duty to honestly look at customary and traditional use practices and changes over time. This is evident when observing the number of moose hunting permits distributed in contrast to the actual moose harvest. The disparity between the number of residents seeking a moose and those successful in their hunt is stark, highlighting the enormous deficiency in the current ANS.

The latest census data from the United States Census Bureau corroborate the Kawerak's claim that population growth in the Seward Peninsula, with Nome's population almost doubling in the

last two decades^[1]. In conjunction with this growth, the demand for moose has surged among the residents of Unit 22, as evidenced by the increasing number of moose hunting permits distributed each year^[2]. Hunting equipment has improved significantly over the last several decades and the pace of technology change has resulted in a mad dash to get moose before it is closes by emergency order. I don't believe there is any moose hunt like how GMU 22's is carried out anywhere else in the state. I am convinced GMU 22B, C and D's moose hunts are the most poorly managed moose hunts in the State.

Despite the rise in demand for moose, the ANS for moose in Unit 22 has not been revised since it was first established 24 years ago^[3]. That oversight is not only detrimental to the local communities' subsistence needs but is also at odds with principles of sustainable wildlife management. A study published in the Journal of Wildlife Management underscores the importance of regularly updating wildlife harvest quotas to reflect current ecological and socio-economic conditions^[4].

^[1]: United States Census Bureau. (2020). QuickFacts: Nome city, Alaska. <https://www.census.gov/quickfacts/nomecityalaska>

^[2]: Alaska Department of Fish and Game. (2022). Moose Hunting Permits and Harvest Data for Unit 22. <http://www.adfg.alaska.gov/>

^[3]: Alaska Board of Game. (1998). 5 AAC 99.025: Customary and Traditional Use Findings for Subsistence Hunting. <https://www.adfg.alaska.gov/static/regulations/wildliferegulations/pdfs/5aac99.pdf>

^[4]: Milner, J. M., et al. (2007). Demographic side effects of selective hunting in ungulates and carnivores. Journal of Wildlife Management, 71(1), 36-47. <https://doi.org/10.2193/2006-169>

Moreover, the frequency at which the moose hunting season closes, often shortly after it opens, contradicts the Alaskan Statute 16.05.258(f) definition of subsistence hunting, which promises a "reasonable expectation of success". The brief hunting period, sometimes falling on weekdays, disadvantages many residents who have full-time employment and can only participate during the weekends.

The practical and legal implications of the current state of moose hunting in Unit 22 raises profound ethical concerns. I agree with Kawerak's argument that reasonable access to resources is necessary for subsistence. The current ANS and current harvest regime does not adequately fulfill access to resources because it has continually resulted in over harvest and is resulting in depressing the moose population. The Board of Game has failed to act to address over harvest.

Moose hunting is a long-standing tradition in Unit 22 communities, integral to the subsistence lifestyle and also to their cultural heritage. The rapid closure of the hunting season disrupts traditions and erodes community identity because moose hunting in Unit 22 has become a derby and race to get to get moose.

There must be a respect for the rule of law. The Alaskan Statute 16.05.258(f) sets a legal promise for a "reasonable expectation of success" in subsistence hunting. The current ANS and the

frequent early closure of hunting seasons breaches this promise, undermining the rule of law and fuelling discontent towards ADFG and the Board of Game.

Given the high cost of commercially available meat in rural Alaska, and the cultural preference for moose meat, the current quotas fail to meet the real-time needs of the local population. The repeated surpassing of the moose quota is a massive failure of the management regime. It is clear ADF&G and the Board of Game are underestimating the community's reliance on moose for their subsistence lifestyle and have based ANS decisions on politics not science and not on ethics. Thus, it is evident that the ANS for moose in Unit 22 needs urgent revision, taking into account current population data and consumption patterns.

The dynamics of moose hunting in Unit 22 illustrate a classic example of the tragedy of the commons. Individual moose hunters are acting independently according to their self-interest and are behaving contrary to a collective interest by depleting a shared moose resource. Moose hunting must go TIER II, the Board of Game has failed to act and long ignored pleas to change the ANS for moose.

Moose hunting is a significant source of food and a cultural practice for the local communities, but has become inaccessible to many because of the rapid closure of the hunting season because of an outdated ANS and consequent moose hunting regime that is not sustainable.

The Board of Game is destroying practical possibilities for the moose population to grow because it has allowed a management regime that for decades has over harvested moose. The members of the public are questioning the intention of the ADFG and Board of Game and have long wondered why over harvest is occurring and not changed especially when members of the public have proposed changes to the ANS for moose. The Board of Game has allowed the over harvest of moose and done nothing. Subsistence lifestyles are at stake and unless the moose management regime is changed it seems clear the Board of Game will continue to violate AS 16.05.258.

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 23: Support



PC 005

Name: Aiello, Dominic

Community of Residence: Hillsboro, OR

Submission Time: 1/13/2024 1:59:32 AM

Comment:

I support option 3, Economic Considerations: Closing non-resident hunting could adversely affect local businesses and services that cater to these hunters, such as charter services.

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Proposal 3: Support



PC 006

Name: Akers, Tayce

Community of Residence: Roseburg, Oregon

Submission Time: 1/9/2024 9:07:32 AM

Comment:

I believe this proposal will drastically affect not only non residents but 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



PC 007

Name: Alaska Outdoor Council

Community of Residence: Palmer, Alaska

Submission Time: 1/10/2024 11:59:25 AM

Comment:

Proposal 3. Do not adopt.

Before excluding, non-federally qualified subsistence users from hunting caribou in GMU 21, 22, 23, 24B, 24C, 24D, and 26A because of conservation concerns first stop allowing the harvest of cows and require all licensed hunters to report their harvest.

Proposal 6. Do not adopt.

The board has the opportunity to address harvest of Mulchatna caribou on a the three-year cycle. Closing all hunting for 10 years is not necessary for conservation.

Proposal 14. Amend and adopt.

Strike any reference to muskox permits only being available to local communities in GMU18.

Proposal 19. Adopt.

Stop the destruction of muskox horns taken in GMU 22. All muskoxen in GMU 22 are legally harvested under a Tier II permit. Only Federally Qualified Subsistence Use (FQSU) hunters can hunt federal public lands, which are by far the majority of lands in GMU 22. Harvest is already strictly limited by permit only the rationale of destroying the trophy value of muskox for conservation reasons makes no sense. There is also no justification for destroying the trophy values of muskox horns on private and state lands when the board has the authority to allow permitted hunting with season dates to accommodate Alaskan hunters.

Proposal 38. Do not adopt.

First close all cow hunts and require harvest reports from all licensed caribou hunters in GMU 23.

Proposal 209. Do not adopt.

The board has plenty of tools to provide harvest, near towns and villages of muskox in GMU 23. AOC does not support establishing target hunts on tier 2 game populations.



PC 008

Name: Alaska Professional Hunters Association

Community of Residence: Juneau

Submission Time: 1/12/2024 11:24:13 PM

Comment:

see attached

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Proposal 3: Oppose Proposal 5: Support with Amendment Proposal 16: Support Proposal
17: Support Proposal 25: Oppose Proposal 26: Support Proposal 28: Support with
Amendment Proposal 29: Support Proposal 33: Oppose Proposal 38: Oppose Proposal 42:
Support

ALASKA

PROFESSIONAL HUNTERS ASSOCIATION, INC.

P.O. Box 240971 ~ Anchorage, AK 99524

Phone: (907) 929-0619

Email: office@alaskaprohunter.org ~ www.alaskaprohunter.org

January 12th, 2023

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the January meeting in Kotzebue. The APHA's members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. The APHA maintains its support of the Board's current allocative policies and believes that the well defined, species specific, resident preferences are in the best interests of all Alaskans.

Guided Hunt Allocation Benefits Resident Hunters, Visiting Hunters, Guides & Non-hunters

APHA commissioned its first socioeconomic report with the McDowell Group in 2014, titled "*Economic Impacts of Guided Hunting in Alaska.*" More recently (2019), APHA partnered with Dallas Safari Club to add to and update McDowell's 2014 seminal work. "*The Economic Importance of Hunters Visiting Alaska; Alaska's Guided Hunting Industry 2019*" provides new information on funding for conservation that our visiting clients contribute to wildlife management. Guiding hunters is primarily an activity that occurs in rural areas of Alaska.

<ul style="list-style-type: none">• 91.8 Million total economic output (2019)	<ul style="list-style-type: none">• 57.4 Million new dollars to Alaska (2019)
<ul style="list-style-type: none">• 59% of guide industry spending occurs in rural areas (2019)	<ul style="list-style-type: none">• 1,380 people directly employed, total employment with multipliers; 1,890 (2019)
<ul style="list-style-type: none">• 85% Active Guides are AK Residents (2019)	<ul style="list-style-type: none">• Visiting hunters (guided & non-guided) purchase 14% of total Alaska hunting licenses (2019)

<ul style="list-style-type: none"> • Guided nonresidents represented only 3% of current licenses but 30% of License/tag revenue 	<ul style="list-style-type: none"> • Visiting hunters (guided & non-guided) contribute 76% of total revenue to the ADFG wildlife conservation fund (2019)
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Significance to Alaskans & Meat Sharing

Guiding hunters in Alaska has its origins in Territorial days. Because of our rich history, guides have deep roots in communities across Alaska, with many guides living in remote communities or “Bush Alaska.” The APHA worked with McDowell to quantify what some of the benefits that Alaskans reap from Guided Hunting. In 2019, 31.9 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 19.1 million in economic activity in the support sector. Hunting guides do what they can to share the harvest; 223,500 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2019.

Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Region V regulatory change. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all members to participate in the drafting of these comments. Our teleconferences were well attended with over 15 individual guides representing small Alaskan businesses participating. You will find that there are some proposals that we don’t have comments listed for. These were proposals that we felt did not directly impact guides or were outside of the group’s purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska’s hunting guides will continue to bring a wealth of wildlife and hunting knowledge to the table.

Proposal 3- OPPOSE & DEFER

The APHA is sensitive to and deeply concerned about the decline in the WACH. The APHA opposes action on Prop. 3 during the Region V meeting. This will allow the board to consider population and harvest data for the portions of the proposal within Region III that are also utilized by the Teshikpuk and Central Arctic Herd (CAH). The APHA urges

caution as the board approaches this proposal because the most current herd composition shows 50:100 bulls:cows in the WACH, indicating a ratio well above management objectives. Because guided hunters make up a portion of the nonresident hunters in the area that will be affected by this proposal we urge more analysis of guided hunting harvest patterns. It has been well documented that guided hunters take wolves and grizzly bear during their hunts. It is also well documented that guide business viability is usually reliant on the ungulate seasons and opportunity. It is likely that data will show guided hunters take of predators during regular sports seasons in results in a positive or at least neutral impact on ungulates because they target bulls and also harvest predators. If this proposal passes and guided hunting is eliminated for caribou there may be a net negative impact because of reduced overall predator harvest.

Proposal like Prop. 3 are complex as is guided hunting behavior. If closing nonresident hunting is considered we urge an amendment that retains guided nonresident caribou hunting if predator harvest ratios are shown in the data to be favorable. This data will not be available in Kotzebue but may be able to be gathered in time for the Region III meeting in Fairbanks.

Proposal 5- AMEND

The APHA strongly opposes Prop 5 as written. We ask that 26A be amended out of the proposal as suggested and supported by the department. As outlined by the department 26A has WACH, TCH and CAR populations with harvest of WACH in the unit by nonresidents believed to be very small.

The APHA is concerned about allocating a “minimum” number of caribou to a registration hunt. Given ongoing conservation concerns with caribou populations in various regions of Alaska, setting a minimum harvest number for a non-subsistence registration hunts seem unwise. However, registration hunts can be useful to track hunter effort, commercial services used etc. The APHA does not oppose the use of a registration hunt per say if it is designed to achieve conservation goals.

Proposal 16- SUPPORT

The APHA supports prop. 16 because wolf numbers are high and any additional harvest resulting from the passage of this proposal will be sustainable. This proposal will also align hunting and trapping seasons in unit 18. The APHA supports alignment of trapping and hunting seasons wherever possible.

Proposal 17- SUPPORT

The APHA supports prop. 17 based on the comments provided by the department. Our members who hunt and guide in this unit report high brown bear abundance in the unit, we are not concerned about a conservation concern developing if you pass this proposal.

PROPOSAL 26- SUPPORT

The APHA supports prop. 26 because it will lengthen the moose hunting season without offering more tags in a limited drawing hunt structure. Our members have provided input that this offer more options for meat handling and allow them to offer a higher quality hunting experience.

PROPOSAL 28- SUPPORT/AMEND

The APHA supports amending this proposal change the hunt structure from a drawing hunt to a registration hunt. Prop. 18 is current written to restructure the drawing hunt to a general season hunt. The APHA has received input from members to the effect that drawing hunts are difficult to operate under and result in uncertainty. However, the APHA is extremely sensitive to department concerns if harvest increases significantly. Guides in the area are not incentivized to destabilize bear populations, they have a vested interest in sustainability. The APHA encourages the board to alter the hunt structure to allow for nonresident hunting opportunities to be managed by registration hunt and then reassess harvest and effort in three years.

Currently residents have a 2 bear bag limit while nonresidents are required to draw a tag. It seems reasonable that an adjustment is warranted to allow for managed, over the counter nonresident opportunity. The APHA is not suggesting any change to the subsistence hunt structure currently in place.

Hunting guides are limited in their by guide use area (GUA) registrations. A registered guide in Alaska can only register for 3 GUAs annually. This means that a guide is generally only registered for a portion of a GMU. Because of this the APHA believes the departments concerns of significant overharvest as having a low probability.

PROPOSAL 29- SUPPORT

The APHA supports Prop. 29 based on the comments provided by the department.

PROPOSAL 33- OPPOSE

The APHA opposes Prop. 33 because it is a regional proposal.

PROPOSAL 38- OPPOSE

The APHA opposes Prop. 38 because nonresident harvest is 97% bulls and current bull:cow is 50:100. The APHA is also aware of growing conservation concerns related to the WACH and that harvest levels may soon exceed harvestable surplus and the interplay of ANS on hunt structures.

PROPOSAL 42- SUPPORT

The APHA supports Prop. 42 based on comments provided by the department.



PC 009

Name: Alaska Trappers Association

Community of Residence: Fairbanks, Alaska

Submission Time: 12/22/2023 7:55:08 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 30: Support

Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708

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

12/15/23

Dear Chairman and members of the Board:

On behalf of over 1200 members of the Alaska Trapper's Association, we wish to share our opinions on a couple proposals you will be considering at your January Western Arctic/Western Region meeting in Kotzebue.

PROPOSAL #16

ATA does not object to the extension of the wolf trapping season in Unit 18 as long as the Department concurs that the resource can support the additional harvest. The increase in harvest opportunity would be good. We defer to the discretion of the Board.

PROPOSAL #30

ATA supports the extension of the muskrat season in Unit 26A. It would provide some harvest opportunity where little exists now and would align the season with that in adjacent units. Pressure on the resource is low and will remain so. Hopefully, any summer catch is utilized as food.

ATA appreciates the opportunity to participate in the regulatory process.

Sincerely,



Randall Zarnke, president



PC 010

Name: Alaska Wildlife Alliance

Community of Residence: Anchorage, AK

Submission Time: 1/12/2024 11:38:03 PM

Comment:

Please see our comments, attached.

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Proposal 2: Support Proposal 3: Support Proposal 6: Support Proposal 7: Support Proposal
13: Oppose Proposal 16: Oppose Proposal 17: Oppose Proposal 28: Oppose Proposal 29:
Oppose Proposal 30: Oppose Proposal 36: Oppose Proposal 37: Oppose Proposal 38: Oppose
Proposal 39: Oppose Proposal 40: Oppose Proposal 41: Oppose



PO Box 202022, Anchorage, AK 99520



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info@akwildlife.org



@AlaskaWildlifeAlliance

Alaska Wildlife Alliance Comments on 2024 Western Arctic/Western Regions Proposals

Proposal 2 - Support

We support the recommendations of the Western Arctic Caribou Herd Working Group. We agree that there is an immediate need to address the current herd decline by limiting the harvest of both bulls and cows to allow the herd population to begin to recover. An exemption from closing 26A may be warranted, due to the blending of the Teshekpuk, Central Arctic, and Western Arctic herds during the winter and spring months, but only 1) if the harvest of WAH caribou in 26A is minimal 2) harvest in 26A is of bulls. Without an the number of WAH caribou taken in 26A, we cannot confirm whether current harvest levels should remain in 26A, and encourage the Board to consider those nuances in their deliberation.

Proposal 3 - Support

We support the recommendation of the Western Arctic Herd Working Group. The decline of the WAH is alarming, and given the instability of habitat and winter conditions due to climate change, there is no guarantee the herd will not continue to decline even if potential harvest restrictions on resident hunters are implemented (proposal 2). If the amount of caribou available for harvest is not meeting the needs of subsistence and resident hunters then non-resident harvest should not be permitted.

Proposal 6- Support

While we recognize the proposal time period needs to be refined, we support a moratorium on Mulchatna Caribou Herd harvest due to the alarming decline of the herd. The most significant causes of mortality for this herd are human harvest, disease and nutritional concerns due to changes in habitat. We cannot easily control disease or mitigate the habitat changes, and there is already a robust predator control program in place that is expensive and almost certainly unlikely to have positive long term impacts given the known threats to the population. The remaining element of Mulchatna caribou recovery that can be controlled is human harvest. We support the current closed seasons and believe the season should remain closed until a proper population objective is established based on the evaluation of the region's carrying capacity. Furthermore the State should develop predictive models based on actual data to estimate population growth rates and refine potential future harvest objectives. Providing adequate law enforcement during season closures would also increase the potential for the herd to potentially rebound faster.

We recognize the impacts to subsistence harvesters if caribou hunting were closed by moratorium. As the area changes to host more shrubs and browse, moose are likely to continue moving in. Therefore, should the research divisions at ADFG find moose populations viable under increased harvest, we also support Proposal 7 in order to mitigate the impacts of the closed Mulchatna Herd season.

Proposal 7 - Support

So long as an extended session would not jeopardize the moose population in Unit 18, we support this proposal, particularly in light of the decline in the Mulchatna Caribou herd and the needs of local subsistence.

Proposal 13 - Oppose

We oppose this proposal for concern of overharvest, wanton waste, and unknown future impacts to muskrat populations and other wetland species. The largest harvest limit the Board has allowed was 50 per day and 100 in possession, but this regulation was reduced to 15 per day and 30 in possession due to reports from local residents that fewer ptarmigan were being observed and harvested since 2014. This reduction in bag and possession limits aligned federal and state regulations as the Federal Subsistence Board had reduced the bag and possession limit for ptarmigan in 2018 due to the same concerns. We believe that increasing the harvest and possession limit would be history repeating itself – dramatic harvest increases followed by future cuts. Further, cleaning Ptarmigan is extremely time consuming, and to ensure the entire use of the organs and extremities, we believe the current harvest and possession limits are feasible to utilize every part of the bird and still gather for subsistence. Finally, we encourage future study of this species by the ADFG to determine the impacts of climate change on populations and subsequently facilitate development of more informed regulations.

Proposal 16 - Oppose


We oppose this proposal based on the testimony of the ADFG (BOG meeting Spring 2022) where State biologists indicated that wolves were not the primary factor impacting the health of the Mulchatna caribou herd and advised the BOG to revisit the Intensive Management Plan for predators in the region. ADFG comments state that wolf abundance is high, yet provide no data to support that claim. The closest wolf data population we could find was from neighboring GMU17.


The wolf research project in Unit 17 was ended early because ADFG could not maintain a collared sample. Further, wolf control was started in Unit 17 before a baseline wolf population could be established. The best available guesses ADFG has on wolf population and distribution is from only 7 months of GPS data in the Mulchatna and lower Nushagak River drainages (17B).


The wide range of harvest, coupled with thin population data that is widely extrapolated, makes the situation in Unit 18 very murky. The Predator Control program is effective in removing wolves from the neighboring Wolf Control Area. Over the past decade, the BOG has liberalized the wolf seasons in neighboring units, and those efforts are less closely analyzed. Add on the liberalization of harvest in all neighboring units, and the Board is essentially enacting defacto predator control throughout the region.


We hope you will consider the situation of wolves in GMU18. The objective of the current IM program is to remove 100% of wolves from the WCA in 17B&C, 9B, and 19B (nearly 10,000 mi²). Liberalized trapping seasons extend past the mating season and into the denning season all around them in GMU 17, 19, 21 and 22. By ADFG's own admission, wolf predation is not a primary threat to Mulchatna recovery. Should the Board and ADFG find biological evidence to support an increase in wolf harvest, we may be amenable, but scapegoating wolves as the solution to Mulchatna caribou herd problem is unscientific. Killing all the wolves



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 @AlaskaWildlifeAlliance

hasn't helped, and we encourage the Board to address the primary threats to Mulchatna caribou recovery before expanding yet another wolf harvest season.

Proposal 17 - Oppose

There has been no evaluation of the recent impacts to the brown bear population in the Unit 17/18 regions after the 2023 predator control operation by the ADFG that resulted in the harvest of 94 brown bears, including several year-old cubs and 11 first year cubs. We encourage ADFG not to extrapolate density estimates from Togiak research, and consider how much has/could have changed in the 20 years since those data were collected. Should ADFG report estimates of the percent of the brown bear population removed in 2023, they must justify the extent of their extrapolation *and* provide context for the Board to understand the range of uncertainty for those numbers. ADFG plans to continue further elimination of bears in the calving grounds through 2028. The proposal is premised on the need of increased bag limits to improve the long term health of the Mulchatna Herd. ADFG biologists encouraged an evaluation of the intensive management program in the 2022 report to the BOG, and stated that the primary factors impacting the Mulchatna Caribou population are human harvest, disease, and habitat changes that have resulted in nutritional stress (not bears or wolves). The long term sustainability of the brown bear populations in this region is currently unknown after the 2023 predator control measures. No population data is available to assess if further harvest of brown bears would be sustainable. Until brown bear populations are determined for the Unit 18, 17 regions, no additional harvest should be allowed to ensure that brown bear populations are maintained at sustainable levels.

Proposal 28 - Oppose

This proposal would make it challenging to regulate brown bear harvest in 22D and 22E. We also oppose an increase to nonresident brown bear hunters and recommend that the permits available for DB690 remain at 21. We acknowledge that the ADFG comments suggest increasing the DB690 permits to 40. Doubling the quota is a significant change, given that the area has been continuously liberalized over the past decade. If the Board desires to increase the BD690 permits, we recommend a more moderate increase based solely upon the quality of the best available bear population data to ensure there is no violation of sustained yield. There are no current bear population estimates for Unit 22D. The last population estimates were based on 1990 data. There has been tremendous change in conditions throughout Alaska since 1990 and new population estimates should be pursued before increasing harvests.

Proposal 29 - Oppose

We acknowledge the Department's recommendation to increase the DB685 permits to 40, but remind the Board that DB685 has historically been undersubscribed in the past ten years and only twice (RY15 and RY22) has the total number of permits been issued. DB685 has an average hunter participation of 74% and an average hunter success of 64% during the last 10 regulatory years (RY13-RY22). If the proponent seeks more nonresident hunting opportunity, the population must be able to withstand harvest levels and the existing 27 tags must be filled before expanding the permit allotment.

Proposal 30 - Oppose

By ADFG's admission "little is known about muskrat abundance since there are no surveys currently being conducted by the department." Without an understanding of muskrat abundance, we believe that a year-round season is unwarranted. We also encourage the Board to consider impacts to other species, such as birds, should a year-round season be permitted. If the Board approves of a year-round season, we strongly encourage a bag limit.

Proposal 36, 37, 38 - Support

We believe these proposals will initiate steps to recover the WAH.

Proposal 39, 40, 41 - Oppose

We oppose these proposals to open year-round harvest of Brown Bears. The purpose of these proposals is to facilitate de-facto predator control, without and research in to bear population and potential impacts to the species. The current season lengths and harvest quotas are sufficient to meet the needs for subsistence and resident hunters. If there are nuisance bears, the DLP permit allows for harvest.



PC 011

Name: Albert, Bryan

Community of Residence: Palmer, AK

Submission Time: 1/13/2024 6:50:28 AM

Comment:

See attached.

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Proposal 2: Support Proposal 3: Oppose
Oppose

Proposal 37: Support Proposal 38:



Comments regarding Western Arctic Proposals to the Alaska Board of Game Submitted by Bryan Albert, Ram Aviation

January 12, 2024

My name is Bryan Albert and I am a lifelong Alaska resident. I was born in Alaska and have lived my whole life in Alaska. I have been flying in Alaska since I was 18 years old. Aviation has always been my passion. Ram Aviation has afforded me the opportunity to live my dreams and show others this beautiful state we call home.

Ram Aviation has been providing world-class caribou hunts out of Kotzebue for more than 25 years. We are a family-owned/run business that employs 5 individuals, all Alaska residents. The viability of our small business directly depends on the health and management of the Western Arctic Caribou Herd, and we are committed to doing our part to ensure the sustainability of this critical resource on which many people depend.

We take pride in the quality of our operation and our contributions to the local community. Our resident and nonresident clients receive clear direction about hunter ethics—both in the field and in town—and meat salvage and care. Although most of our hunters choose to take all or most of their meat home with them, we do facilitate a local donation system. Our nonresident clients spend at least \$810 per person on hunting licenses and tags in preparation for their hunt, which directly funds the Alaska Department of Fish & Game's wildlife conservation and research efforts. While in Kotzebue, our clients spend an average of \$300–\$500 on lodging, dining, and gear/supplies—a local economic impact of \$50,000–\$100,000 seasonally.

We are dedicated to the conservation of the Western Arctic Herd (WAH) and appreciate this opportunity to provide feedback on the following management proposals.

PROPOSAL 2 – SUPPORT

Ram Aviation **supports** this effort to significantly restrict overall harvest to slow the WAH population decline. Resident harvest has historically accounted for approximately 95% or more of the total harvest, while nonresident harvest has accounted for 5% or less. We recognize that this change to 4 caribou a year—only one of which may be a cow—represents a significant reduction for residents, and we appreciate the Kotzebue Advisory Council and the Western Arctic Caribou Herd Working Group for recognizing the conservation concern and need for this change.

We especially welcome the emphasis on reducing cow harvest given the below-average rates of cow caribou survival since 2018. We encourage the department to continue to assess the feasibility of allowing cow harvest until the herd has rebounded above the population objective.

PROPOSAL 3 – OPPOSE

Ram Aviation strongly **opposes** this proposal to eliminate all nonresident hunting opportunities in the WAH range. While we believe the burden of conserving the Western Arctic Herd should be shared by all user groups, this proposal fails to acknowledge the numerous restrictions to nonresident hunting opportunity enacted over the last three decades through both the state and federal management systems. Millions of acres of federal public land in Unit 23 and Unit 26A are currently closed to non-local caribou hunters. Further restrictions on state lands could concentrate nonresident hunting activity even more.

Historically, nonresidents have accounted for 5% or less of WAH total harvest. Currently, transporters account for 2-3% of the total harvest, and our nonresident clients selectively harvest mature bulls only. The current WAH bull:cow ratio (50:1) remain far above the 30:1 management objective. Since 2012, nonresident harvest averaged 256 caribou and the highest nonresident harvest was 374 caribou.

Some nonresidents also harvest wolves during their caribou hunt, which has a conservation benefit considering that 51% of the natural mortality events for WAH adult cow caribou (2006-2022) were attributed to predation. It is also worth noting that our clients have a 100% reporting rate, which helps the department monitor the nonresident harvest.

Importantly, the WAH harvestable surplus currently exceeds the low end of the ANS range. As long as a reasonable opportunity for subsistence exists in accordance with state law, further significant restrictions to nonresidents are unwarranted at this time, especially considering the department's determination that **“the limited number of bulls harvested by nonresidents is believed to be biologically insignificant.”**

In conclusion, Ram Aviation feels strongly that eliminating nonresident hunting opportunity is not warranted at this time. If the board feels that changes to the existing management framework are necessary in 2024, we ask the board to defer action on Proposal 3 to the March 2024 Board of Game meeting in Fairbanks. There are only a handful of transporters and guides remaining in Unit 23 and 26A, and a deferral would allow us an opportunity to collaborate on potential solutions that could address the board's concerns while still maintaining viable small businesses and contributing to the region's rural economy.

PROPOSAL 37 – SUPPORT

Ram Aviation **supports** this proposal for the reasons outlined by the department.

PROPOSAL 38 – OPPOSE

Ram Aviation strongly **opposes** this proposal to eliminate all nonresident hunting opportunities in Unit 23. Our rationale is the same as for Proposal 3. Given that a

reasonable opportunity for subsistence exists for WAH caribou in Unit 23, further significant restrictions to nonresident harvest are unwarranted at this time, especially since Intensive Management measures have yet to be initiated. We also urge the board to consider the department's determination that **“the limited number of bulls harvested by nonresidents is believed to be biologically insignificant.”**

If the board feels that changes to the existing management framework are necessary in 2024, we ask the board to defer action on Proposal 38 to the March 2024 Board of Game meeting in Fairbanks. There are only a handful of transporters and guides remaining in Unit 23, and a deferral would allow us an opportunity to collaborate on potential solutions that could address the board's concerns while still maintaining viable small businesses and contributing to the region's rural economy.



PC 012

Name: Aleman, James

Community of Residence: Boerne, Tx

Submission Time: 1/13/2024 2:44:00 AM

Comment:

Please do not ban nonresident hunting in these areas. I hope to one day hunt these areas which will bring financial benefits to multiple people and small businesses. Transporters, restaurants, hotels, grocery stores, etc benefit from nonresident hunters.

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 013

Name: Allen, Tyson

Community of Residence: Dakota Dunes, SD

Submission Time: 1/12/2024 11:02:02 AM

Comment:

I do not believe the nonresident hunting closure is a good idea as the subsistence hunters kill far more caribou than the nonresidents. Maybe they should be limited on how many they can harvest. As they are harvesting by far, way more caribou than nonresidents.

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 3: Oppose

Proposal 38: Oppose



PC 014

Name: Allison, Eston

Community of Residence: Nixa, Missouri

Submission Time: 12/29/2023 10:21:30 PM

Comment:

As a concerned nonresident hunter I am opposed to Proposal #3. Do not close hunting to nonresidents, but allow residents one less caribou and increase the Brown bear tags availability.

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 015

Name: Alltus, Ryan

Community of Residence: Harrison, Idaho

Submission Time: 1/3/2024 5:35:45 AM

Comment:

Please do not close non resident hunting for bull caribou as proposed in prop3. No cows are harvested by non residents and more money will be brought to Alaskan economy by allowing non residents to hunt caribou. Remove the cow harvest from residents and reduce resident harvest from 5 to 3 or 4 bull caribou. Increase bear and wolf harvest instead please.

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



PC 016

Name: Amundson, Tyler

Community of Residence: Williston, ND

Submission Time: 1/3/2024 1:05:23 AM

Comment:

I am opposing proposals 3 and 38. The small numbers of caribou bulls harvested by non-residents will have a very negligible impact on the health of the caribou herd.

I support proposals 36, 37, 39, 40, and 41 as they will very likely increase the overall herd health with less predators on the land and more cows to breed.

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 36: Support Proposal 37: Support Proposal 38: Oppose Proposal 39: Support Proposal 40: Support Proposal 41: Support



PC 017

Name: Anna, Jared

Community of Residence: Pittsburgh, Pa

Submission Time: 1/13/2024 1:06:22 AM

Comment:

As an Alaskan non-resident that would like to hunt caribou in the future I oppose #3 and 38 proposals.

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.

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

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.

There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

The 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 018

Name: Anwiler, Riechen
Community of Residence: Wasilla Alaska

Submission Time: 1/2/2024 5:51:48 AM

Comment:

Closing the hunting to non residents for caribou will not bring the population up, this will not only effect just caribou but Alaska its self. If the state put money into building areas were hunting isn't allowed to help with over harvest in 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



PC 019

Name: Arctic Air Inc.
Community of Residence: Palmer, Alaska

Submission Time: 1/13/2024 1:15:51 AM

Comment:

See attached written comments. Thank you.

Gary Colbath

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 with Amendment



Sep 17, 2023

Arctic Air Inc.
645 G. St. Ste 100-844
Anchorage, AK 99501

To: Alaska Board of Game

From: Arctic Air Inc. - AK Transporter Lic. #121712

Re: Comment for 2024-2025 caribou hunting proposals & bag limits
GMUs 23 and 26A

We would like to offer the comments below in support of a modification of the current status of caribou hunting in GMUs 23 & 26A to the following:

A revision that permits Residents to harvest 4 caribou per year no more than one of which may be a cow. [Consistent with proposal #2]

A revision that permits Nonresidents to harvest 1 bull caribou per year. Hunting for Non-residents will be by registration running from July 25--September 30 annually. Harvest shall be subject to a quota of animals, set yearly by the Alaska Department of Fish & Game according to herd counts and management objectives. The 2024 quota will be 350 animals. [A modification of proposal #5]

Justification

The Department of fish and Game sets quotas as a management tool for many animals around out State including caribou. Based on 2023 composition, reproduction and survival data, as well as last summer's photocensus of the Western Arctic Caribou herd, the Department estimates that the herd has continued to decline last year, but likely at a slower rate than in the previous years.

The hunting and taking of cows has a devastating affect on the population of a caribou herd and DFG recommendations strongly suggest that cow harvest



Sep 17, 2023

should be eliminated in declining herd conditions. Conversely, a limited harvest of bulls has nominal to no effect on herd population.

To allow for hunting opportunity but minimal the risk of reducing the population more than desired, an annual bull harvest quota for the herd could be implemented to limit any adverse affect of such harvest while still providing ample hunting opportunity. To further prevent overharvest, the Department would als retain the ability to alter the hunt dates or close the hunt on an emergency basis.

The harvestable surplus is 7500 animals from the WACH. Non-residents take less than 1% annually of the overall harvest, all of which are bull caribou and create no impact on the viability of the herd. However, non-resident license fees attributable to hunts in these units (with federal government matching funds) provide over \$1,000,000 annually that could be directed towards the study, conservation and management of this herd. Of course the economic impact on the communities and people within GMU 23 & 26A is even greater.

Non-residents (making up most of the area Transporters clients) have harvested less than 300 caribou annually for the last several years. Herds movements, weather and all the logistical elements that affect these hunts are always self-limiting such that success regularly runs only 60-75% under optimum conditions.

Providing continued hunting opportunity for all individuals, while limiting residents to a bull harvest and non-residents to both a bull, and quota harvest provides a fair balance between opportunity, herd management, and economic benefit to the Department and affect communities. Perhaps most importantly it provides continued opportunity for the State to work to preserve the WACH, not lose it.

This process would also all Transporters to stay in business continue to provide safe, top-quality hunts that bring substantial revenue to the State of Alaska and the city of Kotzebue. Without the non-residents licensing fees the State would lose most of the funding to study this herd. This would leave things in a far worse situation than they are currently in. Continued hunting by all, but with appropriate limits, management and production of revenue is biologically



Sep 17, 2023

sound and perhaps the only way these animals have a chance to survive and flourish.

Thank you,

/s/ Gary Colbath

Arctic Air Inc.

Co-owner/Manager



PC 020

Name: Arreola, Nate

Community of Residence: Seattle, WA

Submission Time: 1/8/2024 10:42:09 PM

Comment:

I am against proposals 3 & 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



Name: Ash, EdwardT

Community of Residence: Plymouth

Submission Time: 1/13/2024 4:59:30 AM

Comment:

I think it is best to allow hunting of the caribou for non- residents considering the valued information from the organization of Howl for Wildlife, as well as from other hunters that been in and out of Alaska. My best proportion would allow the lottery to consist of people who have yet to hunt caribou in Alaska, in terms of either not being drawn or unsuccessful in harvesting a bull. My father and dying to hopefully hunt up in Alaska for caribou, as unfortunately the caribou hunting up in Quebec, Canada (north of our state of New Hampshire) closed due to the main disturbances to the habitat of this caribou population are forest roads, logging and slash-and-burn (clearing by fire). Logging and hydro plantations deprived the caribou of habitat and food. That's I beg not to stop the hunting for caribou for non-residents. We can't be letting emotions from the people against it violate the natural order of the ecosystem of regulatory hunting. We hope you hear this out from a man in New Hampshire.

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: Support 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 Proposal 190: Support Proposal 209: Support



PC 022

Name: Aspittle, Katelyn

Community of Residence: Honeyville, UT

Submission Time: 1/10/2024 3:23:25 AM

Comment:

I, Katelyn, Oppose Proposal 3 Closing Nonresident Hunting. Nonresident hunting only accounts for 5% of animals taken with a significant decline in animal harvest in 2022. Closing nonresident hunting will also drastically decrease income in local businesses and outfitters do to less travelers passing through staying multiple nights waiting for transport into the field.

I Support Proposal 5- Limiting Resident tags will steadily increase the number of caribou while still allowing opportunity for residents to harvest their traditional resource. Mandating residents to report animals harvested will allow for accurate harvest tracking. Turning nonresident tags into a permit will still allow nonresident hunters opportunities and will increase funds to the ADFG with the application fees.

I Oppose Proposal 38- Closing Nonresident hunts in unit 23. The 2022 restriction already reduced the animals harvested during that year to 54 for the entire unit. That is insignificant compared to residents harvesting 5 a day. Eliminating nonresident hunting will decrease local job opportunities and income for businesses and transporters/outfitters.

I Support Proposals 36 & 37 (matching proposals). Reducing the bag limit for residents will steady increase the Caribou population. Without mandating harvest reports there is no accurate way to estimate the Caribou population, without accurate tracking it allows more animals harvested than necessary for survival.

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: Support
Support Proposal 38: Oppose

Proposal 36: Support Proposal 37:



PC 023

Name: Aspittle, Tyler

Community of Residence: Honeyville, Utah

Submission Time: 1/10/2024 4:09:26 AM

Comment:

I Tyler Aspittle

Oppose proposal 3- closing nonresident hunting for Caribou will decrease job opportunities and income to small businesses. Nonresidents stay multiple days in a row and buy supplies from local stores, closing off Caribou hunting will illuminate the need for travel and long stays in multiple locations throughout Alaska.

Support proposal 5- Limiting Resident tags would increase the Caribou population rapidly and mandating harvest reports will help provide accurate population tracking. With turning nonresident tags into a draw permit it would provide ADFG more funds needed for conservation because of the non refundable application fees. While still allowing nonresidents to experience Alaska and harvest 1 Caribou a year.

Support Proposals 36 & 37- Reducing residents bag limit will drastically increase the Caribou population. Without having mandated harvest reporting there is no accurate way to estimate the Caribou population so there is the potential to underestimate just how many Caribou have been harvested or how many is necessary for subsistence survival.

Oppose Proposal 38- Closing Nonresident hunting in unit 23. Eliminating nonresident hunting will decrease local job opportunities and income for businesses and outfitters. The restriction to nonresident hunting area that was effective in 2022 reduced the animals harvested during that year to 54 in total. The is insignificant in comparison to residents harvests of 5 a day.

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: Support
Support Proposal 38: Oppose

Proposal 36: Support Proposal 37:





PC 024

Name: Atkinson, Austin

Community of Residence: Cedar City, UT

Submission Time: 11/7/2023 2:34:04 AM

Comment:

I support proposal #42 with an amendment to increase the bag limit for brown/grizzly bear to two (2) bears per regulatory year for non-resident hunters with a registration permit.

The consolidation of the 14 different registration permits into one permit will greatly help hunters remain in compliance and select their registration permit easily.

With the increase in bear populations alongside the decrease in moose populations in unit 23 and the decline of the Western Arctic caribou herd, I feel it would be prudent to allow the few non-residents that take the time and effort to come to unit 23 the ability to take 2 bears in one regulatory year. This would be equal to the current resident bag limit and would have no biological impact on the species as the guide requirement and federal use concession permit limits would only allow a minimal number of non-residents to hunt unit 23 anyway. Until the caribou and moose herds rebound, we need to focus on keeping the bear population in check as much as possible. I would rather see opportunity first to go-to non-resident hunters that stimulate the local economy than to enact predatory aerial measures to take more grizzly bears.

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 42: Support with Amendment



PC 025

Name: Aubuchon, Duane

Community of Residence: Safford

Submission Time: 1/13/2024 1:55:37 AM

Comment:

I am in opposition to proposals #3 and #38 for the following 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.

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

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. I am not in favor of subsistence hunting. No other state in the US allows it. The time has come for Alaska to admit it does not have the wildlife to sustain the practice and fully implement the North American Model of wildlife conservation.

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

There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population.

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.

I hunted moose, wolf, and bear in Alaska in 2023 and would like to continue hunting there as a non-resident and urge you to vote against 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 026

Name: Aycock, Cameron

Community of Residence: Raleigh NC

Submission Time: 1/2/2024 5:58:10 PM

Comment:

I am opposing the shut down of unit 23 to caribou hunting for non residents, over the years the heard has been on the decline, a more sustainable why to combat this would be to propose more restrictions on the residents, bull only, bulls of a certain size, have a shorter season or possibly a split season. Not to mention the loss of revenue the state will have to allocate funds from other sources.

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 027

Name: Ayers, Ben

Community of Residence: Duncansville pa

Submission Time: 1/2/2024 1:55:48 PM

Comment:

Oppose proposal 3. Nonresidents deserve a chance too

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 028

Name: Baar, John

Community of Residence: Hudsonville, MI

Submission Time: 1/3/2024 12:47:19 AM

Comment:

Closing seasons to nonresidents should never be the answer.

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 029

Name: Bachman, David

Community of Residence: Deer Creek, Oklahoma

Submission Time: 1/2/2024 1:54:48 PM

Comment:

I am commenting in opposition of proposition 38.

I am an avid hunter and passionate conservationist. By excluding more and more nonresidents, the caribou lose valuable advocates. Nonresidents have proven themselves as helpful in fundraising and political support of many wild game species and we want to be an ally.

To cancel nonresident hunting takes away such a valuable opportunity while not addressing the primary cause of decline. Limit nonresident tags, limit seasons, but please consider retaining the nonresident opportunity.

Respectfully,

David Bachman

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 030

Name: Bachmann, Patrick

Community of Residence: Arvada, cO

Submission Time: 1/11/2024 2:28:07 AM

Comment:

Regarding Proposals 3 and 38, and other proposals for which non resident hunting of caribou would be closed, I strongly urge the Board to reconsider such drastic measures. Reduction of harvest of caribou may be warranted, however, the Board should first consider changes to the current resident regulations which allow five caribou per day (cows or bulls) for residents with a year-round season on bulls and a seven-month season for cows as well as Federal subsistence regulations allow for five caribou per day with a year-round season for bulls and eight-month season for cows. Reasonable reductions in these overly generous and much more population impacting season structure/harvest allowances should first be considered prior to a drastic and frankly inappropriate proposal to make non residents shoulder the entirety of the reduction in harvest allotment.

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:



Name: Backcountry Hunters and Anglers

Community of Residence: Juneau

Submission Time: 1/13/2024 7:17:49 AM

Comment:

Re: Board of Game Proposals 2, 3, 37, 38

To the Alaska Board of Game,

The Alaska Chapter of Backcountry Hunters and Anglers (AK BHA) works to conserve Alaska's public lands, waters, fish, and wildlife.

Proposal 2: Alaska BHA also SUPPORTS proposal 2 by the WACH Working Group for to reduce harvest for residents to 4 caribou/year up to one being a cow and acknowledges that this is a significant reduction in resident harvest.

Alaska BHA echoes the department's recommendation to retain existing unit 26A seasons bag limits and defer decisions on units 21D Remainder, 24B, and 24C and 24D until the Interior and Eastern Arctic Region Meeting in March 2024 as well.

Proposal 3: AK BHA OPPOSES proposal 3 to close caribou hunting to nonresidents in units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A, at this time.

While Alaska BHA supports sharing the burden of conservation across user groups, the department has documented their determination that "the limited number of bulls harvested by nonresidents is believed to be biologically insignificant." We also believe further restrictions to nonresident harvest are unwarranted at this time because the WAH harvest surplus is within the ANS range. We also support avoiding the unnecessary reductions of hunting opportunities, where the biological effects are negligible, such as this case with bull-only harvest for nonresidents. While reasonable opportunity for customary and tradition uses exist in accordance with state law, further significant restrictions to nonresidents are currently unwarranted.

We support the department's recommendation to defer the decision on units within region 3 to the Interior and Eastern Arctic Region Meeting in March 2024.

Proposal 37: Alaska BHA SUPPORTS proposal 37: 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, for the same rationale as proposal 2.

Proposal 38: Alaska BHA OPPOSES proposal 38: Close all nonresident caribou hunting in Unit 23, for the same rationale as proposal 3.

Thank you to the Board of Game for your deliberation and careful consideration of 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 2: Support Proposal 3: Oppose
Oppose

Proposal 37: Support Proposal 38:



**BACKCOUNTRY
HUNTERS & ANGLERS**
ALASKA

Alaska Board of Game
PO Box 1467
Bethel, AK 99559
(907) 543-2931

January 12, 2024

Re: Board of Game Proposals 2, 3, 37, 38

To the Alaska Board of Game,

The Alaska Chapter of Backcountry Hunters and Anglers (AK BHA) works to conserve Alaska's public lands, waters, fish, and wildlife.

Proposal 2: Alaska BHA also **SUPPORTS** proposal 2 by the WACH Working Group for to reduce harvest for residents to 4 caribou/year up to one being a cow and acknowledges that this is a significant reduction in resident harvest.

Alaska BHA echoes the department's recommendation to retain existing unit 26A seasons bag limits and defer decisions on units 21D Remainder, 24B, and 24C and 24D until the Interior and Eastern Arctic Region Meeting in March 2024 as well.

Proposal 3: AK BHA **OPPOSES** proposal 3 to close caribou hunting to nonresidents in units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A, at this time.

While Alaska BHA supports sharing the burden of conservation across user groups, the department has documented their determination that "the limited number of bulls harvested by nonresidents is believed to be biologically insignificant." We also believe further restrictions to nonresident harvest are unwarranted at this time because the WAH harvest surplus is within the ANS range. We also support avoiding the unnecessary reductions of hunting opportunities, where the biological effects are negligible, such as this case with bull-only harvest for nonresidents. While reasonable opportunity for customary and tradition uses exist in accordance with state law, further significant restrictions to nonresidents are currently unwarranted.

We support the department's recommendation to defer the decision on units within region 3 to the Interior and Eastern Arctic Region Meeting in March 2024.



Proposal 37: Alaska BHA **SUPPORTS** proposal 37: 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, for the same rationale as proposal 2.

Proposal 38: Alaska BHA **OPPOSES** proposal 38: Close all nonresident caribou hunting in Unit 23, for the same rationale as proposal 3.

Thank you to the Board of Game for your deliberation and careful consideration of these proposals.

On behalf of the Alaska Chapter of Backcountry Hunters & Anglers,



Mary Graves
Alaska Chapter Coordinator
(607) 349-1831
glaves@backcountryhunters.org



WWW.BACKCOUNTRYHUNTERS.ORG/ALASKA_BHA
ALASKA@BACKCOUNTRYHUNTERS.ORG



PC 032

Name: Bahnke, Kevin

Community of Residence: Nome AK

Submission Time: 1/9/2024 6:30:54 PM

Comment:

Regarding proposal 26 I would like to OPPOSE this regulation suggestion. Outside guides are only in it for the antlers, not subsistence food. Northern Air Cargo ships a lot of moose horns out not much meat. MOOSE are already in a decline, and it shows in a competitive area where quotas only last a week at most. Extending their hunting season especially where caribou are on the decline is also not a good idea. 22 D remainder October hunt was closed partly of these reasons. If you wish to open seasons longer do it for all the hunters not just the guides.

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 26: Oppose



PC 033

Name: Baker, McCrea

Community of Residence: Lake Mills, WI

Submission Time: 1/12/2024 1:32:17 PM

Comment:

The proposal to limit caribou hunting to subsistence hunting only will likely have no affect on the caribou population trends. The non resident and resident non subsistence harvest of caribou is insignificant compared to the subsistence harvest. This proposal appears to use declining caribou populations as a means for locals to keep "outsiders" out of their hunting areas. This proposal would unnecessarily limit opportunity for non subsistence hunters and limit economic opportunities for outfitters, transporters, and guides.

Thank you for the opportunity to provide comments.

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 034

Name: Bakker, Johanna

Community of Residence: Auke Bay, Alaska

Submission Time: 1/12/2024 1:41:31 AM

Comment:

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 as follows:

Request that the Mulchatna caribou herd is placed under a moratorium for five to ten years, while reviewing every five years.

I support PROPOSAL 6

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 6: Support



PC 035

Name: Barker, Steve

Community of Residence: Morehead, Ky

Submission Time: 1/13/2024 2:31:18 AM

Comment:

Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation also by shutting out non resident hunting it could have a negative impact on tourism dollars that some of the communities depend on. So i think proposals 3 and 38 would be a huge mistake.



PC 036

Name: Barner, Carl

Community of Residence: Auburn Washington

Submission Time: 1/10/2024 3:07:44 PM

Comment:

I am against 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 037

Name: Barr, Cameron

Community of Residence: Colorado Springs, colorado

Submission Time: 1/13/2024 12:49:17 AM

Comment:

Please keep caribou hunting available for 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: Support

Proposal 38: Support



PC 038

Name: Bartlett, Larry

Community of Residence: Fairbanks AK

Submission Time: 1/5/2024 2:12:40 AM

Comment:

Proposal 3 OPPOSE

Proposal 38 OPPOSE

Reasons to oppose each are combined: 1. The proponent stated to support restrictions for non-resident caribou hunters yet instead proposed complete elimination of harvest allocation for non-resident hunters. The two words have completely different context and effect and should be denied.

2. Proponent cited population counts have declined at a rate of roughly 30,000 caribou in the past three years. Given local harvest exceeds 7,000 caribou annually (reported and unreported) this decline can be plausibly connected to this annual kill rate of cows, calves and bulls (I.e, 3 years x 7000 caribou = >20,000 caribou harvested by local communities). Non-resident take is a small fraction of 300 bulls annually taken by all non-local hunters.

3. A more fair and equitable solution would be to restrict not eliminate non-resident harvest and monitor population rebound following enforced restrictions on local harvest bag limits of cows and calves and reductions in allowable annual harvests of total caribou. This would arm local ACs and the Working Group with a more scientifically supported recommendation rather than eliminating the smallest user group based on targeted ease not severity of impact on herd loss.

Thank you for considering these values when deciding on aggressive elimination vs restriction of non-local harvest opportunity in these vast GMU ranges of the Western Arctic Caribou 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 3: Oppose

Proposal 38: Oppose



PC 039

Name: Barton, Austin

Community of Residence: Phoenix, AZ

Submission Time: 1/7/2024 11:57:23 AM

Comment:

To Whom it May Concern,

It is of my opinion that closure of the caribou units to only non residents will hurt Alaska hunting and the hunting community as a whole. When hunts and opportunities are limited to residents, it prevents non residents from experiencing the unique things a state/species has to offer.

Being from Arizona, we are well know for trophy elk and mule deer, however there are lots non residents who apply to hunt our coues deer. Only us and New Mexico have these and it would not be fair for us to completely block non residents from experiencing these incredible animals, and some of the hardest deer I've ever hunted.

I understand and recognize that fish and wildlife need to manage the resources and that means changes over time, however a blanket no non resident tags is not the solution. Maybe put a cap on how many non resident tags you sell. (See Arizona's OTC archery deer) Or do a draw and then leftover tags if they are available, based on what the biologists think is the right number of tags to be issued. Either way, don't just remove non resident tags completely.

Thank you for the opportunity to voice this comment.

Austin Barton

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 040

Name: Bass, JEREMY

Community of Residence: Santa Barbara, CA

Submission Time: 1/3/2024 3:42:11 AM

Comment:

I vehemently oppose proposal 3, and a non resident that had hunted Alaska before and will again when my kids are able, this would greatly impact my future plans to travel and hunt in Alaska again.

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 041

Name: Batson, Matthew

Community of Residence: Florence, Arizona

Submission Time: 1/7/2024 2:57:46 PM

Comment:

To the Alaska Department of Fish and Game,

I am writing to express my opposition to Proposal 3 “5 AAC 85.025. Hunting seasons and bag limits for caribou.” As a non-resident to Alaska, I have little knowledge on local affairs, but I do vehemently believe that non-residents have a right to hunt throughout this great country of ours.

Specifically in this scenario, the data presented by the proposing party paints a picture in which a caribou herd is in decline, yet the message seeks to preserve the harvest rights of one group and not another. If the herd is in decline, there should be reductions across the board throughout all GMUs that affect this herd. Data based decision making backed by biological research should remain the deciding factor. In your department’s own words, “the limited number of bulls harvested by nonresidents is believed to be biologically insignificant and the department is generally opposed to unnecessary reductions in hunting opportunity”.

Additionally, alienating one group (non-residents) and preserving the rights of another will create animosity amongst the two. In a time in where hunting rights are under attack, common sense laws that preserve the hunting rights of the American people as a whole should prevail. The American Sportsman looks to Alaska as the ultimate adventure and aspires to one day to hunt that land. I sincerely hope the commission makes the right decisions and cements this legacy for generations to come.

Respectfully,

Matthew Batson - Arizona

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

To the Alaska Department of Fish and Game,

I am writing to express my opposition to Proposal 3 "5 AAC 85.025. Hunting seasons and bag limits for caribou." As a non-resident to Alaska, I have little knowledge on local affairs, but I do vehemently believe that non-residents have a right to hunt throughout this great country of ours.

Specifically in this scenario, the data presented by the proposing party paints a picture in which a caribou herd is in decline, yet the message seeks to preserve the harvest rights of one group and not another. If the herd is in decline, there should be reductions across the board throughout all GMUs that affect this herd. Data based decision making backed by biological research should remain the deciding factor. In your department's own words, "*the limited number of bulls harvested by nonresidents is believed to be biologically insignificant and the department is generally opposed to unnecessary reductions in hunting opportunity*".

Additionally, alienating one group (non-residents) and preserving the rights of another will create animosity amongst the two. In a time in where hunting rights are under attack, common sense laws that preserve the hunting rights of the American people as a whole should prevail. The American Sportsman looks to Alaska as the ultimate adventure and aspires to one day to hunt that land. I sincerely hope the commission makes the right decisions and cements this legacy for generations to come.

Respectfully,

Matthew Batson - *Arizona*



PC 042

Name: Baumgart, Chris

Community of Residence: Black creek, WI

Submission Time: 1/13/2024 12:01:48 AM

Comment:

I oppose proposal #3 and 38. As a non resident I would like the opportunity to hunt, fish and possibly trap in Alaska and eliminating the opportunity for non residents would take away the chance. Limit the number of nonresident tags before banning us all

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 043

Name: Beaver, Troy

Community of Residence: Salisbury, NC

Submission Time: 1/6/2024 5:39:43 AM

Comment:

I do not support proposal numbers 3 and 38. If approved, either of these proposals 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.

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 044

Name: Benson, Bradley

Community of Residence: Jamestown, New York

Submission Time: 1/8/2024 6:25:06 PM

Comment:

Opposition of 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 045

Name: Benson, Matt

Community of Residence: Billings, MT

Submission Time: 1/8/2024 6:04:24 PM

Comment:

Opposition of proposals 3 and 38. Regulated hunting, including by non-residents, can be a tool for effective wildlife management and conservation. There is no evidence based reason to close those areas to non-resident hunting. Please do not go through with this. It would be a major mistake that would hinder not help the wildlife 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



PC 046

Name: BENTLEY, RYAN

Community of Residence: Auburn Nebraska

Submission Time: 1/8/2024 6:09:19 PM

Comment:

Opposed

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 Proposal 39: Support



PC 047

Name: Bethune, Justin

Community of Residence: Grand Haven, MI

Submission Time: 1/6/2024 6:38:43 PM

Comment:

I have always viewed Alaska as the pinnacle of outdoorsman opportunities. For the last five years I've been planning on doing a caribou trip as a non-resident this year (2024). Alaska is the last place where high fence hunting and outrageous guiding rates are not completely present. You can still go have DIY opportunities and have the challenge of figuring it out on your own. I don't want to have to pay for a result.

Thank you for taking my comment into consideration.

Justin

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 048

Name: Betzner, Donny

Community of Residence: Kokomo Indiana

Submission Time: 1/9/2024 4:10:44 AM

Comment:

These measures aimed at denying nonresident caribou tags is nonsense. Firstly residents have a 5 per day bag limit for essentially the entire year. While I understand that many Alaskan residents utilize this resource to feed their family that seems to be an extremely liberal bag limit. To say that the solution is to remove or even reduce non resident tags seems absurd. A non resident hunter over the course of their hunt may take one or two caribou total which by comparison is inconsequential. This would also impact the livelihoods of Alaskans who make part of their living transporting hunters to and from the field, who butcher their game, lodging, restaurants and so forth. This would also impact the budgets of your wildlife agencies as non resident tags cost considerably more than resident tags.

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 049

Name: Bingham, Braydon

Community of Residence: Southlake, TX

Submission Time: 1/2/2024 3:16:49 AM

Comment:

I have personally hunted this unit & successfully harvested a caribou in 2018. The closure to non residents is only hurting the local community of Kotzebue. Residents can harvest 5 caribou a day all year long but non residents who spend around \$5,000.00 to shoot one caribou cant? This seems like a political agenda from the Federal Government. It makes no sense to close this unit to non residents when there is such a lucrative resident harvest. Please use sound logic & reasoning when evaluating to keep this open 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 1: Support Proposal 2: Oppose Proposal 3: Oppose Proposal 4: Oppose Proposal 5: Support
Proposal 36: Oppose Proposal 37: Oppose Proposal 38: Oppose



PC 050

Name: Bittner, Michelle

Community of Residence: Anchorage, Alaska

Submission Time: 1/4/2024 7:48:30 PM

Comment:

Dear Members of the Board of Game,

I submit these comments in support of Proposal 6 to impose a five-to-ten-year moratorium on hunting the Mulchatna Caribou Herd (MCH) to allow the herd the time and opportunity to heal and rebound. While there are many factors affecting the precipitous decline of the MCH, from 200,000 in the late 1990s to only 12,000 currently, the primary factors are illegal hunting, poor nutrition, and brucellosis. This is from studies by the Department of Fish and Game's own wildlife biologists. The population of the MCH has fluctuated over the years, but former Deputy Commissioner of the Department of Fish and Game, Ken Taylor, wrote an opinion piece in the Anchorage Daily News recounting how limiting hunting of the MCH allowed the herd to rebound and increase to a peak of 200,000:

“In 1980, through a “handshake” partnership with the National Park Service, we put 20 radio collars on some adult female caribou, which were tracked monthly and used to complete more accurate photo censuses annually, giving us a much more accurate minimum estimate of the herd than we’d ever had in the past. For the next 10 years, the Mulchatna herd continued to grow, primarily in response to some excellent changes to the hunting regulations made by the Board of Game. These included closing the caribou season during the moose season, thus reducing the number of guides and outfitters that had previously offered “combination” hunts for both species. They eliminated all-terrain vehicle use for hunting throughout most of the Mulchatna caribou range, and, at the request of the village elders who served on the Nushagak/Mulchatna Advisory Committee, closed the caribou season for a few years west of the Nushagak to encourage their expansion into some relatively virgin winter range.”

This text is from Ken Taylor’s piece entitled “Alaska Should Discontinue its “Intensive Management” of the Mulchatna herd” published on September 2, 2023.

Due to changing forage, changing climate, and overgrazing of lichen, the MCH may never again reach a peak of 200,000. However, prohibiting hunting of the MCH and enforcing this restriction is the best opportunity to increase the population.

The Board of Game’s currently population objectives for the MCH of 30,000 to 80,000 may not be achievable. As a result, during this moratorium, the Department and the Board of Game should reassess the harvest objectives of the MCH. Here is a graph showing the fluctuation in the population of the MCH since the early 1970s:

(Graph printed in uploaded PDF).

This graph illustrates that the population of the MCH fluctuates and that, for most of this time, the population of the MCH has been at or below 30,000 members. This information should be taken into account when the Board of Game considers Proposal 6.

Respectfully submitted,

Michelle Bittner

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 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 18: Oppose Proposal 19: Support Proposal 20: Support Proposal 21:
Support Proposal 36: Support

Dear Members of the Board of Game,

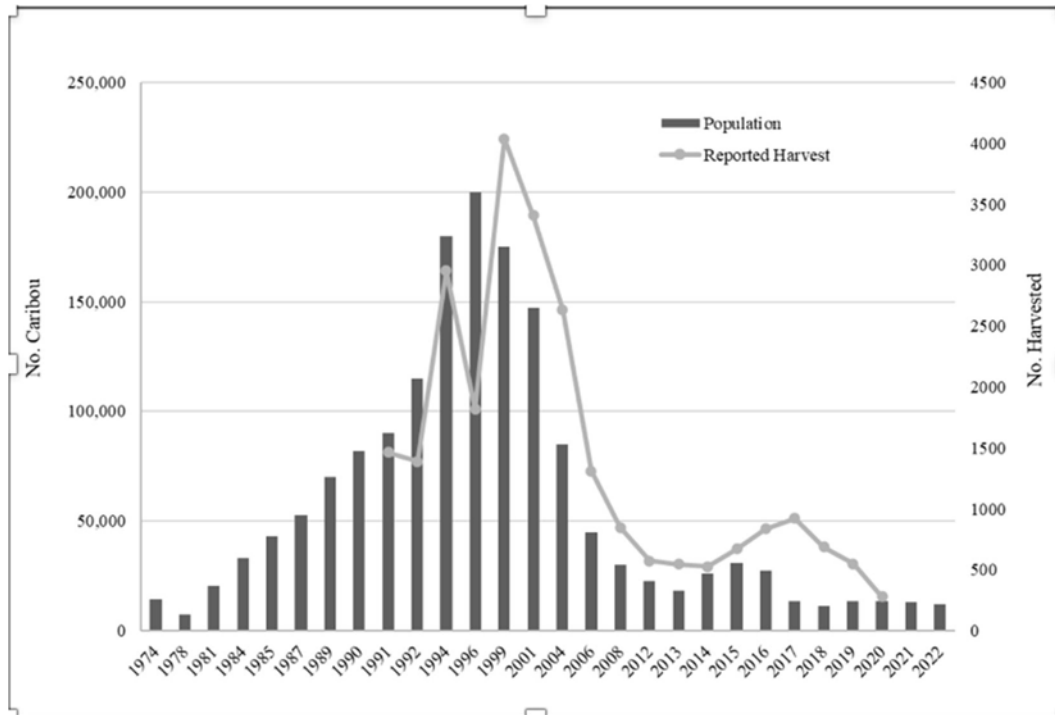
I submit these comments in support of Proposal 6 to impose a five-to-ten-year moratorium on hunting the Mulchatna Caribou Herd (MCH) to allow the herd the time and opportunity to heal and rebound. While there are many factors affecting the precipitous decline of the MCH, from 200,000 in the late 1990s to only 12,000 currently, the primary factors are illegal hunting, poor nutrition, and brucellosis. This is from studies by the Department of Fish and Game's own wildlife biologists. The population of the MCH has fluctuated over the years, but former Deputy Commissioner of the Department of Fish and Game, Ken Taylor, wrote an opinion piece in the Anchorage Daily News recounting how limiting hunting of the MCH allowed the herd to rebound and increase to a peak of 200,000:

"In 1980, through a "handshake" partnership with the National Park Service, we put 20 radio collars on some adult female caribou, which were tracked monthly and used to complete more accurate photo censuses annually, giving us a much more accurate minimum estimate of the herd than we'd ever had in the past. For the next 10 years, the Mulchatna herd continued to grow, primarily in response to some excellent changes to the hunting regulations made by the Board of Game. These included closing the caribou season during the moose season, thus reducing the number of guides and outfitters that had previously offered "combination" hunts for both species. They eliminated all-terrain vehicle use for hunting throughout most of the Mulchatna caribou range, and, at the request of the village elders who served on the Nushagak/Mulchatna Advisory Committee, closed the caribou season for a few years west of the Nushagak to encourage their expansion into some relatively virgin winter range."

This text is from Ken Taylor's piece entitled "Alaska Should Discontinue its "Intensive Management" of the Mulchatna herd" published on September 2, 2023.

Due to changing forage, changing climate, and overgrazing of lichen, the MCH may never again reach a peak of 200,000. However, prohibiting hunting of the MCH and enforcing this restriction is the best opportunity to increase the population.

The Board of Game's currently population objectives for the MCH of 30,000 to 80,000 may not be achievable. As a result, during this moratorium, the Department and the Board of Game should reassess the harvest objectives of the MCH. Here is a graph showing the fluctuation in the population of the MCH since the early 1970s:



This graph illustrates that the population of the MCH fluctuates and that, for most of this time, the population of the MCH has been at or below 30,000 members. This information should be taken into account when the Board of Game considers Proposal 6.

Respectfully submitted,

Michelle Bittner



PC 051

Name: Bittner, Michelle

Community of Residence: Anchorage, Alaska

Submission Time: 1/4/2024 8:20:57 PM

Comment:

Dear Members of the Board of Game,

I submit these comments in support of Proposal 36 to limit the number of members of the Western Arctic Caribou Herd (WACH) that can be killed to 4 per year, only one of which may be a cow. In addition, I think the Board of Game should prohibit hunters from chasing members of the WACH with snow machines and from flock shooting which results in the wounding and eventual death and waste of members of the WACH.

As I understand it, Proposal 36 was approved by the Western Arctic Caribou Herd Working Group. From extensive reading and research, I know that the WACH has declined from 490,000 in the early 2000s to 152,000 currently. This is a decline of almost 70% in just 20 years. Wildlife biologist Jim Dau performed a study on the WACH in about 2010 and determined that the members of the WACH are among the healthiest caribou in the world. As a result, the only explanation for the precipitous decline of the WACH is the lack of limits on hunting. From the early 2000s to a few years ago, hunters were permitted to kill 5 caribou per day for as many days as they wished up to 1,825 caribou per year. This obviously was not good for the WACH as, under these lack of restrictions on hunting, the WACH declined by 67%. The Board of Game implemented regulations a few years ago which allowed hunters to kill 5 caribou per day up to 20 per year and for nonresidents to kill up to 5 caribou. The WACH continued to decline over the past two years to 152,000.

Many years ago, when there were miners and whalers up around Nome and Kotzebue, Alaska Natives hunted an endless number of caribou including calves and the WACH all but disappeared. This example, and the precipitous decline since the early 2000s, must serve as cautionary tales that there must be limits on the number of caribou which can be hunted in the WACH or the herd will decline and eventually disappear. In addition, the caribou must be treated with care and respect. They shouldn't be chased with snow machines and people shouldn't be allowed to shoot into the herd, wounding some of the caribou and scaring all of them.

In addition, the Board of Game should recognize that the range of the WACH is not a game park. The WACH are as much a part of their range as are the rivers, the mountains, the tundra, and the vast, wild lands. The WACH is part of the beauty and wilderness of this area of Alaska and is appreciated by hunters and non-hunters alike.

Respectfully submitted,

Michelle Bittner

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 36: Support



PC 052

Name: Bittner, Michelle

Community of Residence: Anchorage, Alaska

Submission Time: 1/4/2024 8:29:03 PM

Comment:

Dear Members of the Board of Game,

I submit these comments in partial support of Proposals 7 through 12. I understand that you are increasing the allowable number of moose that may be hunted to compensate for the prohibition on hunting members of the Mulchatna Caribou Herd. I know there are villages in those areas around which moose have been overhunted. As a result, I caution the Board of Game and the Department of Fish and Game to ensure that moose are not overhunted to the point that they disappear and to closely watch and study and conduct censuses on the number of moose in each Game Management Unit.

Also, I encourage the Board of Game to consider restrictions on the number of cows that may be killed. In a cow's lifetime, she may produce a significant number of offspring and her offspring may also produce a significant number of offspring. As a result, killing a cow significantly limits the reproductive potential of the moose in specific areas.

Respectfully submitted,

Michelle Bittner

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 7: Support with Amendment Proposal 8: Support with Amendment Proposal 10: Support with Amendment Proposal 11: Support with Amendment Proposal 12: Support with Amendment



PC 053

Name: Bittner, Michelle

Community of Residence: Anchorage, Alaska

Submission Time: 1/12/2024 11:59:52 PM

Comment:

Dear Members of the Board of Game,

These comments are in support of Proposal 2 and Proposal 36. I support the Western Arctic Caribou Herd (WACH) Working Group's proposal to limit the number of caribou killed per year to 4 per resident with only one cow. The WACH has declined by almost 70% from 490,000 in the early 2000s to 152,000 currently. During most of that time, hunters were permitted to kill 5 caribou per day for as many days as they wished up to 1,825 caribou per year. Two years ago, the Board of Game limited the number to 5 per day up to 20 per year and 5 for nonresidents. The WACH continued to decline from 167,000 to 152,000. Clearly, based on what has happened with the WACH, more hunting restrictions need to be imposed.

There is an oral history that has been passed down by the elders in the range of the WACH. In the late 1800s, when whalers and gold miners increased the population of the area significantly, the demand for caribou meat and skins and calf skins increased. Alaska Natives killed thousands of caribou and calves to supply the demand. The WACH all but disappeared from the area for decades. We cannot let this happen again. Hunting regulations play a primary role in the population of the WACH and the Board of Game needs to take preemptive and precautionary action to preserve this herd for current and future generations.

Please support Proposals 2 and 36 to conserve the members of the WACH. This is your constitutionally imposed obligation under Article VIII of Alaska's Constitution.

Respectfully,

Michelle Bittner



PC 054

Name: Black, Jarred

Community of Residence: Canal Winchester, Ohio

Submission Time: 1/13/2024 2:19:26 AM

Comment:

I am writing to oppose proposals 3 and 38. These proposals would, if passed, close a number of units to non-resident such as myself. There is little evidence to support that closing these units would substantially benefit the growth of the Western Arctic Caribou herd given that non-residents account for less than 1% of the annual harvest. These proposals, if passed would also cause a significant hit to local economies.

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 055

Name: Blades, Tyler

Community of Residence: FARMINGTON, NM

Submission Time: 1/9/2024 4:04:14 PM

Comment:

To Who it may concern,

As an avid hunter and conservationist growing up in New Mexico USA it has always been a dream of mine to experince the Alaska tundra and hunt caribou as a non resident. Not having the financial stability or opprotunity to yet expereince hunting caribou in Alaska this is a very heartbreaking act to see Alsaka wanting to take our non resident rights away to hunt Caribou. We as hunters provide more income to every state in the USA through taxes, tags, organizations, and much more than any anti hunitng organizations. I truly believe that Alaska is taking away from its own income for wildilife managment and Alaska resident Jobs (Pilots, Guides, Outifiters and more) and will be a substancial loss for the State of Alaska to pursue and pass these bills to eliminate non resident caridou hunting in Alaska.

Tyler Blades

Email: [REDACTED]

phone: [REDACTED]

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 056

Name: Blalock, Zachary

Community of Residence: Wilson, North Carolina

Submission Time: 1/3/2024 2:40:40 AM

Comment:

I completely disagree with taking away nonresident hunting in Alaska for any species in any areas. This will cost residents jobs and hurt the animals more in these 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 1: Support Proposal 3: Oppose Proposal 4: Oppose Proposal 5: Oppose Proposal 6:
Oppose Proposal 18: Support Proposal 25: Oppose Proposal 28: Support Proposal
34: Support Proposal 38: Oppose



PC 057

Name: Blood Origins Inc.

Community of Residence: Memphis, Tennessee

Submission Time: 1/7/2024 3:40:37 PM

Comment:

Blood Origins is in agreement with the proposals specifically 2, 5, 6, 36, and 37 to reducing caribou harvest. A reduction in harvest quota specifically tied to the reproductive engine of the Caribou herd (cows) is needed to look to sustain and grow the herd back in the future. Blood Origins is opposed to Proposal 3 and 38 that is eliminating non-resident opportunity for hunting Caribou simply because the bull quota provided 1) is a negligible population impact on the Western Herd (0.1% of the herd), and 2) does not impact the reproductive nature of the herd. Additionally there are far wider economic impacts of non-resident hunting removals to rural Alaskans that rely on economic benefits from non-residents hunting caribou that should be noted, and heavily considered too.

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

**PC 058****Name:** Bloom, Matthew**Community of Residence:** Spokane WA.**Submission Time:** 1/13/2024 12:34:31 AM**Comment:**

This is concerning proposal 3 and 38 to stop non resident caribou hunting. I'm concerned this is not based on actual data. Anything concerning wildlife should be based off scientific data from field study's. The length and large bag limit of resident caribou seasons says that there is a strong number of caribou, If that's not the case shouldn't you restrict that first? I'm not sure what the impact would be to local communities who rely on guiding non residents caribou hunting but I imagine it would be significant. Please use science based data to manage your wildlife, this seems to be a dying part of wildlife management in many places.

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 059****Name:** Bodenheimer, Todd**Community of Residence:** Three Forks, Montana**Submission Time:** 12/31/2023 4:23:06 PM**Comment:**

Proposal 3 (Non-Resident Caribou Closure Units 21, 22, 23., 24 and 26). I oppose this proposition. The Nome area ADF&G has non-resident caribou harvest data for Unit 22D/22E dating back more than 10 years. Starting in 2015, the NR quota was lowered to one caribou (bull). 2021 NR harvest was 15 bull caribou, 2022 NR harvest was 13 bull caribou and 2023 data is not yet available. Looking back to 2012, the average NR caribou harvest for units 22D/22E is 11-12 caribou/year.

Mr. Cleveland makes it clear in Proposal 3 that the committee is worried about the cow caribou survival rate year over year. Non-resident caribou hunting (bull only) has nothing to do with the year over year cow caribou survival rate. Cow caribou can only be hunted by Alaska residents, wolves and grizzly bears. I do agree with the proposed Alaska resident harvest reduction to 5 annually (only one of which can be a cow).

The NR bull caribou harvest numbers (less than a half of one percent of the herd size) simply do not warrant a closure. If the Board does decide upon a NR closure, I would ask that it not go into effect until 2025 as many NR hunters have already purchased their 2024 licenses, paid large hunt deposits and made travel arrangements for the 2024 season.

Proposal 28 (DB 690 changing from a draw to an over-the-counter tag). I support this proposition. I have been fortunate to enjoy the remote territory NE of Nome and have observed many grizzly bears. I recently applied for the DB 690 draw tag and hope the stars align in the 2024 February drawing. It is well documented the adverse effect the grizzly bears have on caribou and moose calves (along with wolves and weather). They are a tough animal to get a population estimate on and they are a formidable opponent when trying to hunt them. I believe it would be a win all the way around in the tags were to be made available over-the-counter. E.g. A NR hunting shows up to hunt caribou, moose or both and decides to purchase a tag prior to departing to a remote camp/hunt location. The ADF&G makes an easy \$1000, the hunter has the tag in his/her pocket and if all goes well, the hunter and his/her guide harvest a beautiful grizzly bear. One less bear to predate on the following years caribou and moose calves. I would propose this change go into effect Aug.1, 2024 and the grizzly bear harvest rate be monitored. If by some means the harvest rate over the next few years is exceptionally high, then a proposal for change (back to a draw system) could be submitted for the 2027 review period.

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: Support



PC 060

Name: Bodick, Stephen

Community of Residence: Kalispell, Montana

Submission Time: 1/6/2024 3:54:53 AM

Comment:

I oppose proposal #3 & #38 and how it negatively impacts non resident hunters as well as the negative financial impacts to the communities that rely on the income received from out of state hunters.

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 061

Name: Booth, Francis

Community of Residence: Orland, California

Submission Time: 1/11/2024 7:01:29 PM

Comment:

To whom it may concern,

Some general history of why I'm submitting my comments today will date back to the fall of 2011 when I personally hunted this area and successfully killed two caribou on that trip. I flew into Kotzebue with family members that lived in Anchorage at the time and were kind enough to include my father and I on their annual caribou hunting trip up the Kobuk River. My family members had a close friend that lived in Kotzebue and was our transportation to and from our hunting spot along the Kobuk River. Now back in 2011 to me there was a healthy herd of caribou that we saw migrating south. It was an absolute once in a lifetime experience and I'm so thankful that I got to experience that with my father and family members.

Now to my main reason of concern here is that the native Alaskans absolutely massacred the caribou while I was on this 10 day trip. I've never witnessed anything like this in my life and neither had my father. The both of us were stunned and appalled by the amount of caribou that were being killed along with the method of kill. Every kill we witnessed other than our own were caribou being shot in the back of the head from a boat while the caribou swam across the river

during migration. It was brought to our attention by a native fish and game warden from one of the villages along the Kobuk river that my 100 yard shots that I made on my caribou was considered dangerous and long range shooting. He continued to tell us that I was too kill the caribou while they cross the river like everyone else.

Lets get back to the real reason why I think the caribou herd is on the decline. The state of Alaska has allowed residents to destroy their own population of caribou. Who in their right mind would allow such ridiculous regulations and utterly reckless allocations of the number of caribou a local resident can kill each day. Lets break down the numbers here and see what I'm talking about. Alaska currently and has been allowing 5 caribou a day for 365 days a year. Now I get that the caribou move and migrate but lets say they didn't for a general idea of how many caribou one Alaskan person could kill per year. That number comes out to 1,825 caribou per person per year. Right there should show you how silly it is to allow year around hunting and a 5 per day limit. Its not the non residents killing off the caribou population, its the native "subsistence" people that are decimating their own herds.

My measly 2 tags for a non resident per year that I went and applied for is not the reason for the caribou decline. Thus, I don't think non residents should be punished for the utterly foolish behavior and reckless regulations that Alaska has allowed to reward its own residents with.

This all comes from someone who does not plan on heading back up into that area ever again to hunt due to the preferred method of hunting and killing of these majestic animals.

Would love to see the population recover and flourish but I think Alaska needs to look its self in the mirror on this one and be fair when it comes to the new proposed ideas on limiting tag numbers for both non residents and residents.

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 36: Oppose Proposal 37: Support with Amendment Proposal 38:
Oppose



PC 062

Name: Bourdon, Wilson

Community of Residence: Nome, Alaska

Submission Time: 12/15/2023 7:11:33 PM

Comment:

I don't want my horns cut on my muskox Tier II permit. I hunt for the meat not the horns and it's a waste. I want to be able to hang the skull in my house.

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 19: Support with Amendment



PC 063

Name: Bourdon, Wilson

Community of Residence: Nome Alaska

Submission Time: 12/29/2023 8:13:53 PM

Comment:

I do not like cutting the horn tips because I am not a trophy hunter, I am a meat hunter. I would like one complete skull to keep. It is a waste of the horns. I support this proposal with the amendment to remove the trophy destruction requirement altogether.

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 19: Support with Amendment



PC 064

Name: Bowman, Brandon
Community of Residence: Faber, Virginia

Submission Time: 1/9/2024 5:49:44 AM

Comment:

Proposal #3 and #38

Both are based on emotion not science.

Non resident hunting has little impact.

Hunting is 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 065

Name: Boze, Doug
Community of Residence: Mount Vernon Washington

Submission Time: 1/8/2024 4:52:06 AM

Comment:

I oppose the banning of non resident caribou hunting on items 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 066

Name: Brann, Josh

Community of Residence: Walnut Creek, California

Submission Time: 1/11/2024 7:48:58 PM

Comment:

Hello,

Please do not accept proposals #3 and #38. These proposals restrict non-resident hunters access to caribou hunting. I am a former Alaska resident (born and raised) but currently live out of state. Non-resident hunters have no significant impact on the Western Arctic caribou herd population size. As such, there is no scientific basis for implementing these proposals in relation to population trends of the herd. Managing wildlife, and hunting opportunities, on a non-scientific basis will only lead to worse outcomes for wildlife populations. Implementing these proposals will not influence the population trend of the Western Arctic caribou herd, but it will disenfranchise a portion of the hunting community, while all possible support from hunters of all types is needed to ensure ongoing strong support for effective wildlife management across Alaska.

Thank you for your consideration.

Josh Brann

Former Alaska 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 3: Oppose

Proposal 38: Oppose



PC 067

Name: Bratton, Dustin
Community of Residence: Palmer, AK
Submission Time: 1/2/2024 10:14:33 AM
Comment:

I oppose proposals 3, 25, 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 25: Oppose

Proposal 38: Oppose



PC 068

Name: Bridgforth, Chase
Community of Residence: Norman, OK
Submission Time: 1/3/2024 12:03:42 AM
Comment:

I strongly oppose Proposals 3 and 38. Both proposals prejudicially target non-residents. Allowing continued take of female caribou by residents and subsistence hunters is in direct conflict with the stated goals of recovering the herds in question. If the decline warrants tag reductions and/or closures, so be it, but to only impose the closure on non-residents smacks of non-science based wildlife management policies with ulterior motives.

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 069

Name: Bronson, Aaron

Community of Residence: West Haven, UT

Submission Time: 1/3/2024 8:06:05 PM

Comment:

As a true nonresident outsider looking in this is bazar. I have studied and followed this subject with great concern. Having hunted the area for moose prior and seeing what happed to its closure (shut down) it has me scratching my head. What bothers me with this caribou closure for One: it passed as a two year closure already. Now you want to close it again. Two: the numbers don't make any sense the Western Arctic Herd declined to 152,000 caribou down from one year ago at 164,000 acknowledge and account for community harvest of 7,000-10,000 annually in that range. If so, is the herd rapidly declining or are we counting all the caribou harvested by locals? $164,000 - 152,000 = 8,000$ fewer caribou in roughly 12 months. Nonresidents kill around 300 bulls. 300 compared to residents 5 a day including cow and calf. Stop killing cows and calves enforce harvest quotas and we call all hunt caribou 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 38: Oppose



PC 070

Name: Brooks, Jonas

Community of Residence: Fort Worth, Texas

Submission Time: 1/13/2024 7:55:57 AM

Comment:

My wife and I are non resident hunter who traveled to Alaska for the first time last year for hunting. We loved it so much we came back a month later for our kids to see how great the state of Alaska is. Hunting is what brought us here and what is going to bring us back. Gives us purpose and provides for our family food and life experience. Our plan is to travel here to see wild places. Hunting gives us reason to go to these places. We truly love the landscapes. If hunting is blocked from all non residents it would give most of us no reason to travel here and see these places. Unfortunately, taking this away lessens the value to non residents to help protect these places. We understand trying to control the declining numbers in the caribou herd. We all want more caribou in Alaska. We ask that you please follow the science from the subject matter expert biologists on this. It is my understanding that non residents kill only bulls and a total amount that is almost insignificant to total herd size and is a small fraction of total of caribou killed each year by hunters. This could also have wide spread effects on surrounding caribou herd pressures, local business, and non resident funding. I also don't see this being the best answer to increasing herd size. My family, We oppose proposition 3 & 38 as we want to maintain the value to these wild spaces for everyone. Please consider other wildlife management plans. As a non resident who wants to travel back, thank you for letting us comment

J Brooks

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 071

Name: Brower, Arnold

Community of Residence: Utqiagvik

Submission Time: 1/9/2024 7:11:24 PM

Comment:

oppose proposal #2

Support proposal #4, #31, #32

suport #35 with amendment

#35 amend the timeline of taking to September to April annually. take boundary off for Utqiagvik resident since there are only five permits allowed..

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 4: Support
Support Proposal 35: Support with Amendment

Proposal 31: Support Proposal 32:



PC 072

Name: Brown, Alton

Community of Residence: Palmer, AK

Submission Time: 12/31/2023 12:01:55 AM

Comment:

Proposal 3: Closure of Western Arctic herd to NR

It has become very clear in recent years that hunting is under attack across the country. These attacks has various disguises but the most successful ones fall under the disguise of NR vs Resident hunting. These attacks are almost always successful because they fall under false pretenses of selfishness thus causing division among hunters when we need to band together against the greater threat. This underlying issue is becoming so great that National organizations such as SCI, DSC, and many others are voicing concerns over it. The BOG made a mistake last year in siding with these attacks when they closed 19C NR sheep without any limitations on residents. Hopefully the BOG does not make the same mistake two years in a row.

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 073

Name: Brown, Austin

Community of Residence: Vinita, OK

Submission Time: 1/9/2024 2:04:48 PM

Comment:

There is no economical or biological benefit to closing caribou hunting to non-resident hunters, quite the opposite.

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 074

Name: Brown, Judson

Community of Residence: Katy, Texas

Submission Time: 1/13/2024 2:53:39 AM

Comment:

I oppose Proposals no. 3 and 38 to close portions of the state to non-resident hunters of caribou, resulting in significant loss of hunter opportunity. These proposals to close units to hunting is not supported by sound wildlife science. Non-resident hunters have limited impact to caribou populations, primarily targeting bull caribou which is consistent with sound population management practices. The proposals also disregard the economic and conservation benefits that out-of state hunters provide to the State of Alaska and its wildlife populations.

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 075

Name: Brown, William

Community of Residence: Columbia, SC

Submission Time: 12/29/2023 12:38:45 PM

Comment:

I vehemently OPPOSE Proposal 3. I have harvested a caribou and wont be harvesting another, but during my trip I fell in love with the state and returned 2 years later on a 25th anniversary trip for 3 weeks with my wife. I am sure that plenty of non-residents have discovered Alaska this way and spent plenty of additional monies in the tourist industry. With regards to the herd, RESPONSIBLE management and follow-up are the key, not bans.

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 076

Name: Browne, Ryan

Community of Residence: Reno, NV

Submission Time: 1/13/2024 1:31:24 AM

Comment:

I am writing in regard's to Proposals 3 and 38: Closure of Caribou Hunting for Non-Residents.

I have been adventuring in Alaska over the past 20yrs. Hunting, fishing, and vacationing with my family has become a staple in my household. When I read Proposal 3 & 38 I was floored that the State of Alaska would even consider the banning of non resident hunters for caribou hunting.

Although I have not had the opportunity to pursue these magnificent animals, I have followed this issues for years as a previous hunting trip was canceled due to an unsubstantiated federal ban in 2018 in unit 26

Modern day wildlife management should be based on science. What I have read on this topic is not based on science. The banning of caribou hunting for non residents hunters will have no impact to the continuing decline of the Norther Arctic caribou heard is absurd. Non residents take a small fraction of the overall caribou on a yearly basis (250/yr average) when compared to an estimated +14,000 caribou taken by subsistence hunters.

Addressing the caribou population decline requires a comprehensive strategy that considers all factors, including climate change, habitat loss, subsistence management, and not just hunting regulations.

I urge the Alaska Board of Game to use the scientific data the state has collected over generations to manage the heard and oppose Proposal 3 & 36 as it is nonsense.

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 077

Name: bruss, stephen

Community of Residence: Portland

Submission Time: 1/13/2024 8:43:50 AM

Comment:

Regarding proposal 3. It seems that non residents harvest a relatively negligible portion of the the overall caribou. It seems that the reason for the herd reduction is unknow. I'd suggest charging more for non-residents so that hunting can go on, but in reduced numbers and the extra income from those hunts could help fund extra biologists to try to figure out what the real problem is. 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



PC 078

Name: Bryner, Josh

Community of Residence: Salt Lake City, Utah

Submission Time: 1/6/2024 5:14:20 PM

Comment:

I strongly oppose proposal 3 and 38. As a non resident I value the opportunity to travel to Alaska and spend thousands of dollars in the Alaska community while pursuing caribou. These proposals would limit that 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

Proposal 38: Oppose



PC 079

Name: Bubolz, Nick

Community of Residence: Oregon, Wisconsin

Submission Time: 1/9/2024 7:58:41 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.

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 080

Name: Buchanan, Jeff

Community of Residence: Roseville, California

Submission Time: 1/12/2024 11:45:54 PM

Comment:

I strongly oppose.

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 081

Name: Bullard, John

Community of Residence: Beaumont, Texas

Submission Time: 1/7/2024 10:23:29 PM

Comment:

I am very disappointed to see proposals No. 3 and No. 38 to close vast amounts of Alaska caribou hunting territory to non-residents entirely and oppose these oppositions. Hunting caribou in Alaska is a dream for myself, my son, and many of my hunting friends that do not reside in Alaska. Does the scientifically collected data demonstrate that non-resident hunters are having that much of an impact on the herd? I doubt it. Is the proposal even based on actual scientific studies? If not, it should be. If hunting in general is reducing the herd numbers and non-residential hunters have a significant impact on that, then perhaps something less drastic can be done. It also should not be closed to non-residents unless there is an objectively measurable standard set for when it will be re-opened.

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 082

Name: Bungay, Ken

Community of Residence: Nome

Submission Time: 1/9/2024 5:53:40 PM

Comment:

In addition, I propose that a small percentage of at least one or more permits be issued by Lottery, to applicants who did not harvest a Muskox the year before. This will help diversify and encourage new participants in the hunt. With the current seniority-based issuing structure, many residents don't bother applying for the hunt, because they have Zero chance of getting a permit for that year or any year in the forcible future.

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 20: Support with Amendment



PC 083

Name: Bunnell, Alec

Community of Residence: Pleasant Grove, UT

Submission Time: 1/8/2024 6:57:43 AM

Comment:

I oppose.

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 084

Name: Butler, Brad

Community of Residence: Texas

Submission Time: 1/6/2024 4:07:35 PM

Comment:

I oppose the proposal to reduce or restrict out of state hunting opportunities. Alaska is the dream experience for every outdoorsman/woman. Although I have not had the opportunity to experience such a majestic place, it is absolutely on my bucket list. I just pray that the opportunities are still there for when I am able to make it happen. Please don't take this dream away from myself and the countless others who have the same dreams and passions.

Thank you

Brad Butler

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 085

Name: Buxengard, Ryan

Community of Residence: Hudson, WI

Submission Time: 1/12/2024 9:27:32 PM

Comment:

I am opposed to both #3, and #38 for the reasons that I believe removing nonresident hunting will not significantly impact the caribou herd size. It will also have a negative impact on the people who rely on the monies provided by nonresident hunters for their livelihood. It is also a dream of mine to bring my son to Alaska to hunt caribou in the future.

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 086

Name: Cardenas, Tomas

Community of Residence: Issaquah, WA

Submission Time: 1/6/2024 4:21:51 AM

Comment:

Please don't. There's nothing more I'd love to do than to be able to sustainably hunt Caribou one day 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 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
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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 087

Name: Carey, James

Community of Residence: Bonners Ferry, ID

Submission Time: 1/3/2024 4:11:10 AM

Comment:

I am comment in opposition to proposal 3, the ending of nonresident opportunities to hunt caribou in specific units. I have been planning and saving to hunt one of these units in 2025 or 2026 closing down these opportunities for non-residents doesn't make sense. It hurts Alaska more than anyone else. Nonresident hunters bring in huge amounts of money and provide countless jobs for residents to capitalize on. Taking those opportunities away from Alaskans by ending nonresident hunting hurts Alaskan 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 Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Support with Amendment Proposal 6: Support with Amendment 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: Oppose 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: Oppose Proposal 32: Oppose Proposal 33: Oppose 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



PC 088

Name: Carter, Aaron

Community of Residence: Kasilof, Alaska

Submission Time: 1/12/2024 7:17:45 PM

Comment:

To whom it may concern

We are writing in regard to proposals #3 and #38 concerning the closure of nonresident caribou hunting. We have not

done extensive research on the caribou. Although in reviewing records from the fish and game the indication is that since

2016 the total non-resident harvest is on average around 250 animals per year. It would be a logical assumption that

those animals were all bulls since F&G regulations only allow nonresidents to harvest bulls. If the purpose of these

proposals is to conserve the caribou population, then eliminating nonresident hunting is pointless, considering the

extremely lax regulations on resident hunters. As printed in the 2023 – 2024 Alaska hunting regulations, residents are

allowed to harvest 5 caribou per day (20 total) in unit 22; 5 caribou per day (with no total limit) in units 23 and 26 and in

all these units, there are little to no restrictions on harvesting cows. If we are truly concerned about the population and

health of the species, why are we allowing pretty much uncontrolled harvest of cows? It doesn't take much to

understand that when the number of reproducing females is reduced, the population as a whole is reduced. When

natural death, predation and even the unrestricted subsistence harvest are considered, a mere 250 bulls harvested by

nonresidents is an insignificant factor. If a ship is sinking, you plug up the major leaks, not the pinholes – and nonresident

hunting is a pinhole. The science and numbers indicate the reason behind the fluctuation of the caribou population,

which is on a cycle of about 15-20 years. In August 2023, the Alaska F&G published data detailing the status of the herd

and with an ultimate conclusion that the most significant factor responsible for the excessive mortality of the herd is the

low survival rate of mature cows. In our opinion it would be much more effective to place more restrictions on the

resident and subsistent harvesting of the females of the species than eliminate a nonresident harvest of 250 bulls.

While we don't dispute the claim that natives and residents are having to travel farther and into new areas to harvest

caribou, more significant factors contributing to this are not being considered. The human population in those areas is

increasing and technology is advancing. Better rifles and scopes dramatically improve the odds of a harvest. Boats,

airplanes, and ATV's make areas more accessible. In my experience hunting other species, when pressured they quit

frequenting those areas and alter their migration patterns.

We will skip over discussing the financial impacts of closing off hunting to a specific interest group. These points are

belabored. The most important aspect of this issue is the female harvest. Obviously when a reproducing female is

harvested, the possibility of offspring is terminated. The life cycle of that animal is generally between 8-10 years, and

they don't begin breeding until they are about 2.5 years old. This means that on average they will have 6 calves in their

lifetime. Factor in a mortality rate of about 50%, and we're left with 3 surviving young. Put that data into a pyramid and

over the span of 20 years and the conclusion is simple - stop shooting the cows.

In closing we believe that when it comes to us as conservationists, we should be more focused on the predators and the

harvest of the cows. We can't control the weather or the feed, but we can control our harvest.

In addition, we approve of proposals #2, #4, #5, #16, #26, #27, #28, #33, #34, #36, #37, #39 and #40.

Sincerely

Aaron & Brittany Carter

Alaska Residents

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Name: Carter, Jessa

Community of Residence: Utah

Submission Time: 1/11/2024 5:38:35 PM

Comment:

I oppose proposals #3 and #38. There is not scientific evidence to support these proposals. Non resident hunters take between 250-300 bull caribou which does not hurt the population. Taking cows is what hurts the population.



PC 089



PC 090

Name: CARTER, TYLER

Community of Residence: Aurora, Utah

Submission Time: 1/10/2024 9:34:14 PM

Comment:

I would like to OPPOSE proposals #3 and # 38. Since I was a young boy one of my dreams has been to experience Alaska and harvest a caribou on a DIY style hunt. My wife and I have saved for years to experience this and are finally getting close.

The small amount of BULLS that non- residents harvest is not in any way hurting the population of caribou in Alaska, not to mention the economic impact it will bring to the residents of Alaska who rely on the non-residents spending to provide for there families. If you are concerned about the herd numbers then proposals #2,#36, and #37 I would like to support. Residents reduce the harvest of cow caribou and I feel like it will have more positive influence on the population then negative influence.

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Proposal 2: Support Proposal 3: Oppose
Support Proposal 38: Support with Amendment

Proposal 36: Support Proposal 37:



PC 091

Name: Casari, Kiel

Community of Residence: West Columbia, TX

Submission Time: 1/13/2024 4:53:29 AM

Comment:

I oppose proposals #3 & #38. There are too many positive benefits to non-resident hunting of caribou in these areas.



PC 092

Name: Cash, John

Community of Residence: Sarasota, FL

Submission Time: 1/11/2024 10:01:38 PM

Comment:

Proposals 3 and 38. This land is federal land. Owned by all US Citizens. A closure to certain citizens is clear discrimination. The population of caribou is in decline due to a lack of predator management and the ability for "native" people to kill females. Look at the science and numbers. Remember the Pittman Roberts Act that pays for this research and land conservation. Those animals belong 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 093

Name: Ceballos, Howard

Community of Residence: WINNEMUCCA, Nv

Submission Time: 1/8/2024 4:48:15 PM

Comment:

I oppose 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 094

Name: Char, Jared

Community of Residence: Honolulu, HI

Submission Time: 1/2/2024 5:45:03 AM

Comment:

Oppose 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 095

Name: Charman, Craig

Community of Residence: Mariposa, CA

Submission Time: 1/11/2024 3:28:54 AM

Comment:

Good day. I am writing in opposition of Proposals 3 and 38. Admittedly, I am not a resident of the region and have no first hand knowledge of the caribou population numbers. However, from the research I have done from credible sources, it is OBVIOUS that eliminating non-resident opportunities would have no real measurable effect on the caribou population. This is in huge contrast to the amount of cow and calf caribou harvests that are done every year by residents. Perhaps instead of eliminating one of the very few sources of income (both to the local economy and conservation efforts) slight changes are made regarding the harvesting of cows and calves that actually have a meaningful impact on herd numbers. I am planning a trip in 2026 with a small group of hunters and our families to the region to not only hunt but experience the wonders the area has to offer. The hunting portion of the trip is the cause for the visit and without it, the region loses out on tens of thousands of dollars while preventing the responsible harvest of 3-4 caribou bulls. That doesnt add up to me. Thank you for your time.

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Proposal 3: Oppose

Proposal 38: Oppose



PC 096

Name: Chizek, Mickey

Community of Residence: Grass Valley, CA

Submission Time: 1/11/2024 7:32:59 PM

Comment:

Non-resident bull caribou hunting and harvest has a minuscule impact on overall herd health of the Western Arctic Caribou Herd. Taking less than 2% of the total males of the herd does not impact the population. What does impact the population is cow harvest, predation and winter weather patterns.

Most of these proposals are nothing more than a power and land grab by selfish subsistence hunters and liberal politicians. If the season is closed to non-resident hunters while the herd increases in size these same two parties will then find other excuses not to re-open non-resident caribou hunting once populations increase. Additionally, the subsistence hunters should realize they are playing with fire and that after the liberal politicians take away non-resident caribou hunting, they will come for the subsistence hunters next.

Caribou populations have always fluctuated and have been known to increase dramatically as seen from 2016 to 2017 (roughly 30% increase), non-resident bull caribou hunting does not impact this. These proposed closures are not based on science, only emotion. The land and animals do not belong to politicians and a few people living in very remote locations. The North American Wildlife model says they belong to all citizens and will be managed in a way that their populations will be sustained forever. Please keep in mind that the caribou belong to all citizens, not just subsistence hunters.

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Proposal 25: Oppose Proposal 36: Support Proposal 37: Support Proposal 38: Oppose
Proposal 39: Support Proposal 40: Support Proposal 41: Support



PC 097

Name: Choromanski, Steven

Community of Residence: Littleton, CO

Submission Time: 1/13/2024 12:00:53 AM

Comment:

Opposition to proposal 3 & 38:

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.

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Proposal 3: Oppose

Proposal 38: Oppose



PC 098

Name: Christensen, Ammon

Community of Residence: Springville, Utah

Submission Time: 1/9/2024 3:07:29 PM

Comment:

When I was little I would wake up early every Saturday and turn on the TV. Unlike most kids turning on cartoons I would turn on hunting and fishing shows. These shows would help my imagination run wild I would imagine my self hunting all over the world with the shows hosts. One of the hunts that I have never stopped imagining is a Alaskan caribou hunt.

I almost never will comment on these things but I decided to this time because I felt like these changes could directly affect my chance of hunting Alaskan caribou. I know that there are other opportunities but cutting downs opportunities only congregates hunters and maybe those units and hunts would be the ones that would work for me.

I would hate to see non resident hunting in these units become completely closed to non resident hunters. I would think that closing them would be the last option, I can see cutting tags due to lowers number or shortening season but I feel like cutting season is a way to limit non-resident from enjoying those parts of Alaska. I would hate to all together loose the opportunity to hunt those areas. I know I know less that biologist and natives but I would just like to ask that other options are taken than shutting non- residents down. Thank you for listening to me and hopefully it gets taken into consideration.

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Proposal 3: Oppose Proposal 4: Support
Oppose Proposal 42: Support with Amendment

Proposal 25: Oppose

Proposal 38:





PC 099

Name: Christison, Will

Community of Residence: Mesa, AZ

Submission Time: 1/11/2024 6:11:17 AM

Comment:

I don't any to show my vehement opposition to proposal 3, 25, and 38 which aim to remove non-resident hunters from caribou and moose hunts in multiple units. As a non-resident of Alaska and a new hunter, it is my dream to one day hunt caribou, moose, and many other types of game in Alaska. I believe the we as non-residents bring in the majority of the money to the date in terms of hunting fees, short term lodging, and guide services. Please do not reduce our ability to visit and enjoy the old life in this great state.

Thank you!

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Proposal 3: Oppose

Proposal 25: Oppose

Proposal 38: Oppose



PC 100

Name: Cirenza, Allison

Community of Residence: Denver, Colorado

Submission Time: 1/3/2024 3:24:30 AM

Comment:

Proposal 3 to have no caribou season open to nonresidents is just crazy. The incremental financial impact that nonresident hunters bring to small Alaskan communities is positively huge. Resident hunters do not need 4 caribou/day, and a happy-medium could be achieved by allowing a once in a lifetime hunt for non resident hunters to hunt a caribou. This would substantially help the local communities up there.

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