

Name: Gossett, Darren Community of Residence: Clinton, Montana

Submission Time: 1/13/2024 3:14:21 AM

Comment:

I feel that the proposal to keep out of state hunters from hunting caribou in the units, in proposal 3 & 38, should not be allowed. If number of caribou is an issue, find better practices such as, bag limits and the amount of time allowed to hunt. As I'm looking in the near future to be able to come hunt the great state of Alaska.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Gossling, John Community of Residence: Rigby, Idaho Submission Time: 1/10/2024 5:48:21 PM Comment:

Proposal 38: I oppose.

Reasoning for opposition:

Proposal 38: I oppose.

Reasoning:

Based on recorded and oral histories the Western Arctic Caribou Herd (WACH) has experienced significant population fluctuations over the last century. Many factors contribute to these historic swings in population. While the current population has dropped significantly from historic highs, it is still roughly 2 times larger than the herd's historic recorded low. This may suggest there is still time to avert further population declines. While there are reasons to proceed with caution, the WACH Management Plan should focus only on recommendations that have a long-term positive material impact on the population.

#1) Based on the harvest numbers in the WACH Cooperative Management Plan 2019, nonresident harvest represents about ~2% of the total harvest. Nonresident harvest is restricted to a single Bull Caribou. The nonresident harvest of ~250 Bull Caribou annually represents ~.16% of the total Western Arctic Caribou Herd. This number by any statistical, scientific, or laymen observation is insignificant and has no material impact on a herd the size of the WACH. This is especially true since it only involves the harvesting of Bull Caribou. The consideration of nonresident harvest as a potential factor in the overall WACH population health is irrelevant compared to much larger impacts associated of cow harvest.

#2) The WACH Cooperative Management Plan 2019, states that subsistence harvest is between 10,000-15,000 Caribou annually. At the current herd population estimate of ~160,000 animals, the subsistence harvest represents between 6.3%-9.4% of the total Caribou population. This equates to a subsistence harvest that is 40-60 times higher than the nonresident harvest. Additionally, when subsistence harvest includes a high percentage (>10%) of cows this has a significant negative multiplier effect on the population trajectory due to a loss of future calves.

Based on studies by the US Fish & Wildlife & similar studies of Barren Ground Caribou in Canada, Caribou cows calve at 2-3 years of age and their reproductivity can be as long as 12 years. Thus, harvesting of a female Caribou not only removes a single individual from the population but also removes her offspring and their posterity as well. Thus, when the annual subsistence harvest includes a significant number of cows, it has a significant negative impact on the herd population.

#3) Predator management, especially on winter range and calving grounds, should be seriously considered as one of the tools to stem further herd decline and aid in recovery. There are many examples of effective predator management efforts in Alaska that have aided in various ungulate herd recovery efforts.

#4) The Caribou in Alaska, including the Western Arctic Herd, are a shared resource that should not be for the exclusive enjoyment and benefit of a single group or a select few. The Herd Management Plan should be inclusive of these various groups and focus on supporting a vibrant and lasting Caribou herd for the enjoyment of all.

Any conflicts or disputes between the various users of the resource should be addressed on a case-by-case basis, as they may or may not be directly relevant to the broader issues of herd health and population sustainability.

Sincerely,

John Gossling

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Name: Gossling, John Community of Residence: Rigby Idaho Submission Time: 1/11/2024 10:05:14 PM Comment:

Proposal 3:

Oppose

Proposal 3 should be dismissed out of hand as it seeks to blatantly deny access sole based on a resource users Current state of residency. The caribou in the state of Alaska are not owned by individuals nor a single user group. They are a resource to be enjoyed and appreciated by all.

Due to existing harvest restrictions on nonresident users, their impact on the health and population of the Caribou herds in question are insignificant at best. Nonresidents are only allowed to harvest a single bull caribou. The most significant direct human impacts on caribou populations are subsistence harvest that includes the harvest of cows. Subsistence harvest in these units alone exceed ~12,000 caribou annually. The harvest of cows during a period of population decline only further accelerates the population decline. Both scientific and local knowledge support this.

Impactful and sustainable management to support rebuilding of the caribou herds in question should involve very limited or no cow harvest by any user group. Additionally, proven wildlife management based predator control should be strongly considered.

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Name: Gottschling, Harrison Community of Residence: Fairbanks Alaska Submission Time: 1/2/2024 11:33:27 PM

Comment:

If there's a worry about keeping caribou numbers in check then we shouldn't allow cows to be taken at all. The non resident harvest has zero impact on the overall population of the herd. The money that they spend brings money to the state and the fish and game program. Resident and subsistence fees are one for one significantly less than non resident fees. People also pay residents of the state to fly in or get outfitted to do these hunts. This just adds on to more non scientific based closures for various areas of the state. This is in opposition to proposal 3

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Proposal 3: Oppose



Name: Graham, Eric Community of Residence: Vacaville, California Submission Time: 1/2/2024 9:57:50 PM

Comment:

I feel that there needs to be more scientific evidence and study done to correctly determine the best way to manage the population. Stopping hunting completely does not help in the management of the population. Use the resources that are already available to make the proper changes if necessary. Too many government entities are stripping away rights completely based strictly on biased opinions and not evidence. Make adjustments accordingly based on the findings.

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Name: Green, Barrett Community of Residence: Reno, NV Submission Time: 1/4/2024 3:37:02 AM

Comment:

I'm writing in regard to proposals 3 & 38. I am against these proposals because they are unfair to non-resident hunters. The state of Alaska has taken the position of being neutral on these proposals because the harvest of bulls by non-residents is "biologically insignificant." I believe it's important for states to manage wildlife in an objective and scientific manner. If the small harvest of bulls by non-residents doesn't effect the herd in a biologically negative manner then there is no reason to limit this hunt.

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Proposal 3: Oppose



Name: Greer, Kent Community of Residence: Billings, MT Submission Time: 1/12/2024 11:45:18 PM Comment:

I oppose number 3 & 38 and here's why.

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

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

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

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

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

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

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

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

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

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

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

Proposal 3: Oppose



Name: Gregg, Breanne Community of Residence: Duvall, WA Submission Time: 1/7/2024 11:37:13 PM

Comment:

Banning non-resident hunting for Caribou in NW Alaska is clearly not about numbers of caribou. Non-resident hunting in 2019 alone brought \$12.8M of the state's \$47.1M budget. This would be detrimental to Alaska's fish and game revenue that helps the state with more than just sell tags and boost numbers. This revenue keeps the conservation of all animals in the state alive.

"It's important to remember that caribou herds do naturally oscillate greatly in size. The Western Arctic Herd numbered only about 75,000 animals in 1975, after declining from 242,000 in 1970. It then rebounded to 343,000 animals by 1985." This is clearly a control issue and not a concern for the animals themselves. This is also not a hunting issue, these natural fluctuations in numbers can be adjusted by tags provided, ending hunting for non-residents does not fix the natural way of life for these animals and potentially issues they could be having in their habitat with predators or other environmental factors. The only thing this will do is hurt the conservation funding to help all native species in the state of Alaska by limiting resources and funding from non-resident economic stimulation.

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Proposal 3: Oppose



Name: gregory, scott Community of Residence: West Richland, WA

Submission Time: 1/10/2024 3:38:00 PM

Comment:

I disagree with this proposal3 & 38 to close out of state hunting for caribou. Out of state hunters only take bulls at a very low percentage rate of the herd from the number provided by the AFWL. Where residents can kill up 5 cows and calves per day for a much longer period of time. I'm not saying that NON-Residents should have more opportunities than the residents. I just believe closing it to Nonresidents only is not in the best interest for ALASKA

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Proposal 3: Oppose

Proposal 38: Oppose



Name: Grenda, Adam Community of Residence: King Salmon,AK Submission Time: 1/2/2024 5:30:45 AM

Comment:

I oppose proposal #3. I agree with ADFG that the low number of non resident harvested caribou would not be of concern. The hunting benefits Alaskan guides, outfitter and transports immensely. In addition, this hunt supports the community with donated caribou meat from hunters. In addition to this the funding put into the rural communities is a massive benefit for those who live there where is it difficult to make a living.

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Name: Grieser, Joshua Community of Residence: Anchorage, AK Submission Time: 1/12/2024 9:22:37 PM

Comment:

The number of harvested animals do not tend to indicate that non-resident hunting has any impact on herd size. Instead of closing this to non-residents, maybe we should be looking at resident harvest and restricting it to bulls only or a limited number of cows.

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Proposal 1: Support Proposal 2: Support Proposal 3: Oppose Proposal 33 Support Proposal 34: Support Proposal 36: Support Proposal 37: Support Proposal 38: Oppose



Name: grothe, nicholas Community of Residence: charlotte, nc Submission Time: 1/11/2024 1:59:10 AM Comment:

Greetings,

I am reaching out in opposition to the proposals aiming to restrict non-resident hunters' access to caribou hunting in the specified regions outlined in the current proposals. Although I have not had the opportunity to visit Alaska, it has long been a dream of mine to embark on a trip, particularly with the prospect of hunting caribou in the Western Arctic. Last year, I contacted a local hunting guide who informed me of the existing temporary ban on nonresident hunting in the area. More recently, I learned about the proposal to permanently prohibit non-resident hunters from accessing this region.

While I acknowledge and respect the concerns surrounding the current decline in the caribou herd population, it appears there is limited evidence supporting hunting, whether by locals or non-locals, as a primary factor. After conducting some research, I don't understand how prohibiting no-resident hunters will aid in helping the herd rebound. If dialing back the amount of caribou killed by hunters in the goal, I believe adjusting the bag limits (specifically for cows) of subsistence hunters would have the most impact.

Moreover, I believe the local community relies on the income generated by non-local hunters, contributing significantly to their businesses and overall livelihood. I urge you to reconsider these proposals and explore alternative conservation methods to address the decline of the caribou herd. By doing so, we can preserve the right of both locals and non-locals to access federal land that belongs to all of us.

Thank you for your consideration.

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

Proposal 2: Support with Amendment Proposal 3: Oppose Proposal 36: Support with Amendment Proposal 37: Support with Amendment Proposal 38: Oppose



Name: Guillette, Daniel Community of Residence: Bishop, TX Submission Time: 1/9/2024 12:15:26 AM

Comment:

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

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

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

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

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

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

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

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

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

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

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

Proposal 1: Support Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Support Proposal 6: Support Proposal 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: Oppose Proposal 39: Support Proposal 40: Support Proposal 41: Support Proposal 42: Support Proposal 190: Support Proposal 209: Support



Name: Gustafson, Maxwell Community of Residence: Casper, Wyoming

Submission Time: 1/10/2024 5:19:04 AM

Comment:

I am commenting to express my concerns over proposals #3 and #38. I strongly oppose the closure of hunting in these units for non resident hunters. The harvest of caribou by non residents will have little to no effect on the overall population of caribou. Bulls do not carry calves and there is no evidence to support that hunting by non residents has had a population level impact. I strongly believe in making large decision such as this based on evidence and not emotion. These proposals are not based on any evidence and are not going to change the caribou population. Non residents are important to hunting a provide significant economic benefit to the state and local community in which they travel to hunt. Furthermore, Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations. I strongly oppose these proposals

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Proposal 3: Oppose



Name: Guthrie, Jay Community of Residence: Kalispell, Montana Submission Time: 1/9/2024 3:17:06 AM

Comment:

I'm writing to oppose proposal 3 and 38. They lack scientific data and need more research. Also non-resident hunters have very low impact on the area and animals not to mention they pay a lot more money to the state for hunting opportunities.

I support more research and better/different management practices.

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Proposal 3: Oppose

Proposal 38: Oppose



Name: Gutwein, E.Chad Community of Residence: Rensselaer, Indiana Submission Time: 1/4/2024 3:36:23 PM Comment:

Hello, having hunted Moose north of Nome in 2018 and Brown bear on Kenai peninsula in 2021, I am considering returning north of Nome for a caribou hunt in the near future, still saving money for the expense. I would like you to consider other alternatives rather than shutting off caribou hunting to non-residents. From my research it appears there are a lot of Caribou harvested but very few by nonresident hunters. I don't know the numbers, but one would have to think the money us hunters bring to the economy has to have an impact on places like Nome. I look forward to returning to Alaska!!!

Thanks for your consideration.

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Name: Haberstroh, Logan Community of Residence: Mott, ND Submission Time: 1/10/2024 4:24:14 PM

Comment:

Proposal 3 & 38, involving nonresident closures of caribou hunting. I oppose both proposals. Reason being, I understand I'm a nonresident. I know the issues with the herd population, but what I understand is that these proposals are not based on science and more of an emotional state. You look at how only 700 caribou are taken by non residence but 10,000-14,000 are taken by residents for subsistence and many are cows. If you want to increase populations put stipulations on the sex taken. By shutting down non residents you are taking one step into stoping hunting. Never in my life would I have thought the great state of Alaska, a state that has the last true lost wilderness would close hunting down to nonresidents. Being a nonresident hunter, it is heartbreaking to see a place that incredible and a dream of mine to hunt since I was a young child. As an outsider looking in, I am also looking at the perspective of your residents and what this will do to your outfitters. 700 caribou is a very large source of income for the residents of the your state. I hope it doesn't come to this. To see a state trying to shut down hunting to nonresidents, honestly it's a dangerous step. You take that step you are one step closer to closing down all hunting. It's no different than Colorado reintroducing wolves. Absolutely a terrible idea voted on by people who have no clue and are not deciding on science based facts. I hope you choose to go against these proposals, not only for our generation but the generations of caribou and our own youth to come.

Thank you for your time

Logan Haberstroh.

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Proposal 3: Oppose



Name: Halstead, Anthony Community of Residence: Casper Wyoming Submission Time: 1/4/2024 3:31:00 PM

Comment:

In regards to the closure of non residential caribou hunting in northwest Alaska, I completely oppose. Is there any data to show that stopping non resident hunters from hunting will have any meaningful effect on the population? Non residents harvest a very small portion of the total harvest as well as the fact that they harvest only bulls. As a citizen of the United States I find it appalling the idea that I can be locked out of any federal land that is by definition owned by the people. It may be the belief of some that no one from the lower 48 survives on wild meat and that we are all wasteful horn hunters. This couldn't be further from the truth. Science based management practices have always been the standard by which game has flourished and should continue to be the standard by which herds are managed wether it's an elk herd in the Rockies or the caribou herds of north western 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
24: Oppose Proposal 25: Oppose Proposal 26: Oppose



Name: Halverson, Alden Community of Residence: Baldwin,WI Submission Time: 1/13/2024 4:16:29 AM

Comment:

I won't take up a lot of your time, but as a non-resident of Alaska, I have always had a desire to pursue big game in Alaska. Taking away seasons in certain units makes the road to closure easier and I oppose proposal 3 and proposal 38. Thank you for your time.

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Proposal 3: Oppose

Proposal 38: Oppose



Name: Hamilton, Kyle Community of Residence: Anchorage, Alaska Submission Time: 1/9/2024 10:41:45 PM Comment:

I am AGAINST, the proposal that would close non-resident hunting in the areas discussed. Specifically proposals 3 and 38. I think it is a major overreach and flies in the face of how our state should be managing the resource.

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Proposal 3: Oppose



Name: Hammer, Justin Community of Residence: Rigby, Idaho Submission Time: 1/10/2024 11:26:42 PM

Comment:

I do not support eliminating non-resident hunting of Caribou in proposal 3 and 38. There is no data to support this action will have any significant effect on the caribou numbers. I would suggest that a rule be applied that only mature bulls can be harvested this will reduce the likelihood of females being shot (mistaken for a small bull).

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Proposal 3: Oppose

Proposal 38: Oppose



Name: HAMMOND, WALKER Community of Residence: Spokane, WA Submission Time: 1/13/2024 5:55:18 AM

Comment:

I am writing to oppose proposals 3 and 38. Non resident hunters have a minimal impact on caribou harvest and provide a needed economic boost to isolated, rural communities. A more sensible approach to reducing harvest during population declines is to reduce season dates, limits, or overall tag numbers. Cutting the non-resident out does very little to reduce harvest and will have a negative impact on businesses in the region.

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

Proposal 3: Oppose



Name: Hansen, Jason Community of Residence: Utah Submission Time: 1/2/2024 5:43:33 AM Comment:

I completely oppose proposal #3

It makes no sence!

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

Proposal 3: Oppose



Name: Hansen, Matt Community of Residence: Ammon, Idaho Submission Time: 1/10/2024 5:42:40 AM Comment:

Hunting caribou has been a life dream of mine. With the price of hunts going up across North America, I would like to go do a caribou hunt on my own or with a friend without spending money on a guide. 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



Name: Hanson, Phillip Community of Residence: Zimmerman, MN Submission Time: 1/3/2024 1:06:40 AM

Comment:

In August of 2022 I hunted with the help of a guide and outfitter in unit 22 for Caribou. I personally saw four caribou on the first day of the hunt that were two miles away. Two cows and a male juvenile came my way. The guide told me to hold off as we would see adult bulls in the remaining six days of hunting. We didn't see any more caribou in the remaining six days.

I do think you need to cut back on the future hunts and grow the herd. I would cut the resident subsistence hunters, resident hunters, and non-resident hunters. Our guide from Brevig Mission told us he could get 20 caribou in a season. Five per day limit. Seems excessive to me. I would not completely shut out the nonresident hunters. Alot your outfitters some tags to keep their business going. Many of the outfitters donate the meat to the villages. Nonresident hunters add to your local economy while staying in hotels before and after the hunts. Do not cut all of the nonresident hunts out.

As far as the start date of this year 2024, you need to rethink that as hunters already are booking flights, making hotel reservations, and have their names in for other animals in the draw for a tag. And they have already given downpayments on hunts for this fall of 2024. Make your start date 2025.

Thank you for considering my recommended changes to your plan,

Phil Hanson

Zimmerman, MN

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Proposal 3: Support with Amendment



Name: Harlan, Jared Community of Residence: Austin, Texas Submission Time: 1/11/2024 12:13:04 AM Comment:

I oppose Porposals 3 and 38.

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Proposal 3: Oppose

Proposal 38: Oppose



Name: Harris, Mike Community of Residence: Wasilla, Alaska Submission Time: 1/13/2024 6:04:05 AM Comment:

Alaska Board of Game,

Thank you for taking the time to read these comments and for taking them into consideration when making important regulatory decisions. I am an Alaskan resident hunter and have a very strong interest in the principle of many of these proposals.

Proposals 1 & 34:

SUPPORT - contrary to the "neutral" but still swaying opinion in the department comments, I do not believe just a handful of Bowhunters are going to put enough pressure on this sheep population to affect them negatively. Other states have long ago recognized the conservation tool that archery seasons give us. If there is no season, but there could be a season with no biological concern using more limited equipment, why not allow it? Sure, not everyone will take part in a more limiting hunt but they have the opportunity if they so wish. Those that due take advantage of the opportunity will be better off than if they had no opportunity at all, regardless of their success in taking an animal. Due to the restrictions on weapons, permit acquisition and strict reporting requirements and full curl management listed in this proposal, I see no reason why it should not seriously be considered.

Proposals 2, 5, 36 & 37:

SUPPORT - I agree that non subsistence sport hunters do not need to shoot 5 caribou a day and that they do not need to take more than 1 cow. Sport hunters (and I am one), need only the opportunity to pursue a limited number of animals. The hunt, not the taking of many animals should be the goal.

Proposals 3 & 38:

OPPOSE:

I believe that if at all possible, we should allow nonresident hunting of caribou. Especially with the dwindling opportunities. However, the bag limit should be strict and 1 animal seems appropriate.

Proposal 13:

OPPOSE - I am an avid ptarmigan hunter. I enjoy pursuing these birds and taking a few once in a while. Why someone would want to take 50 in a single day is beyond me. Even for subsistence purposes, I do not think that high of a bag limit is sustainable. The last thing I want to see is someone riding a snow machine and shooting 50 ptarmigan sitting on the snow with a .22. That is not sporting and not good for preserving our ptarmigan populations.

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Proposal 1: Support Proposal 2: Support Proposal 3: OpposeProposal 5: SupportProposal13: OpposeProposal 17: SupportProposal 25: OpposeProposal 32: OpposeProposal34: SupportProposal 36: Support Proposal 37: Support Proposal 38: OpposeProposalProposal



Name: Harrison, Trevor Community of Residence: Anchorage, Ak Submission Time: 1/10/2024 10:25:03 PM

Comment:

Please shut this hunt down door non resident hunters. Alaska herds need a break in order to repopulate. Also allow for more predator control to be done.

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Proposal 3: Support



Name: Hasenoehrl, Mary Community of Residence: LEWISTON, IDAHO

Submission Time: 1/10/2024 9:48:31 PM

Comment:

Proposal #28 - I support proposal #28 as the bear are having critical impact on not only the Western Artic Caribou herd, but also a nearby Mulchatna herd. Simplifying the Brown Bear hunting permit process will make it easier for out of state hunters to obtain an Alaska permit with continued monitoring of Brown Bear population and responding as necessary by the Alaska Board of Game each year.

Proposal #3 - I oppose proposal #3. It would close all caribou hunting to out of state hunters. Over the years, in response to declining Caribou, the Alaska Board of Game has targeted out of state hunters with regulations that have progressively decreased their hunting opportunities.

Proposal #2 I support proposal #3. This would for the first time in over 40 years decrease the number of Caribou that can be harvested by Alaska residents. Currently they can harvest 5 PER DAY! Bulls have a No-Closed season and as many as 5 per day for 365 days can be harvested by Alaska residents.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy: Proposal 2: Support Proposal 3: Oppose Proposal 28: Support



Name: Hatch, Jason Community of Residence: Midland, TX Submission Time: 1/6/2024 5:27:11 PM Comment:

Proposal 3 & 38.

I would hate to see caribou hunting opportunities, stripped from non-residents. It seems to me on the research I have done that there is no good, biologically founded, reason to take these hunting privileges away. I hunted that area north of Kotzebue a few years ago and had such an incredible time. I would love to see others have that same opportunity.

The amount of Caribou that non-residents take out of that heard compared to the local subsistence hunting is very small. I think it would be a tragedy and very unhealthy direction for the game and fish office to start making decisions like this that are seemingly solely political. This decision would not be based on scientific data. Not only that, I'm sure it would have very negative financial implications for those local economies. Please consider leaving these hunts.

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: Haughey, Matthew Community of Residence: Brentwood, Tennessee

Submission Time: 1/6/2024 11:32:39 PM

Comment:

I would hate to see non residents lose these hunting opportunities.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy: Proposal 3: Oppose Proposal 38: Oppose



Name: Haynes, Marshall Community of Residence: McCall, Idaho Submission Time: 1/13/2024 12:53:00 AM Comment:

I OPPOSE proposals 3 and 38 which would further limit nonresident caribou hunting. Follow the science, This will not help the caribou population.

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 nonresident hunting to the decline in the caribou population.

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

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

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

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy: Proposal 3: Oppose Proposal 38: Oppose



Name: HEAD, JEFF Community of Residence: Cedar Crest, NM Submission Time: 1/13/2024 1:57:55 AM

Comment:

I am opposed to proposals 3 & 38, to eliminate caribou hunting opportunities of all non-resident hunters. From my research and looking at the population and non-hunter take numbers, this approach does not make sense. Not to mention the fact that this will have an economical impact for interior resident Alaskans that provide services/products to noon-resident hunters. I believe that facts and reputable animal biologists should be involved in these types of rulings or decisions. As a New Mexican, I have travelled to Alaska twice - once on a fishing trip with my father and once on a self guided float trip to hunt moose with my father. Both were amazing experiences! Our next trip that we are trying to plan is a caribou hunt. I believe that all non-residents should have the opportunity to hunt caribou in Alaska. Thank you for your time!

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

Proposal 3: Oppose



Name: Hebert, Brian Community of Residence: Kaysville, UT Submission Time: 1/9/2024 4:48:08 PM

Comment:

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

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

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

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

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

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

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

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

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

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

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

Proposal 3: Oppose



Name: Heil, Jeff Community of Residence: Medford, Oregon Submission Time: 1/12/2024 6:14:33 AM Comment:

I oppose proposals #3 and #38.

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

Proposal 38: Oppose



Name: Helgerson, Ryan Community of Residence: Grand junction, CO Submission Time: 1/4/2024 5:04:37 AM Comment:

#3 and #38. ADAMANT OPPOSITION.

This is not the solution. Non residents provide so much to small communities and do not remove a fraction of bulls from the herd. This is completely asinine and you are going to hurt your own communities if this goes through.

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

Proposal 3: Oppose



Name: Henderson, Brody Community of Residence: Belgrade, Montana Submission Time: 1/3/2024 4:50:57 PM

Comment:

I oppose proposals #3 and #38. Eliminating nonresident caribou hunting in these areas is unnecessary. Nonresident caribou bull harvest numbers do impact long term population goals. Eliminating these hunts will have drastic negative financial impacts on local communities and businesses such as air services, outfitters, food and lodging, etc. The amount of nonresident harvest of caribou bulls could easily be offset by lowering the daily resident bag limit of cow caribou that are allowed to be harvested by residents. If less cows are harvested then more calves will be born each year.

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

Proposal 3: Oppose



Name: Henderson, Justin Community of Residence: Salem, Utah Submission Time: 1/3/2024 5:44:27 AM

Comment:

I strongly oppose proposal 3. As a nonresident, I do support that residents should be given priority. If the true concern is the over health and numbers of the population, then I would think sound management would be to reduce the harvest of females. The harvest of males has been proven to not negatively impact the population or reproduction of the herd. Non resident tags are minimal in comparison to the resident harvest and only impact the males (usually older more mature males) the economic impact of non residents is huge and helps the small communities as well as most of the meat is donated back to residents that are in need. Non resident hunters are a win, win. Not only to the population of the herd but to local economies as well. Thanks

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

Proposal 3: Oppose



Name: Hibler, Chris Community of Residence: Filer Idaho Submission Time: 1/3/2024 6:02:07 PM Comment:

As a non-resident I do not support shutting down hunts for non-resident. My family and friends have spent a lot of money in Alaska both to fish and game and in the local communities. Please do not take more opportunities away from the people that pay your salaries.

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

Proposal 3: Oppose



Name: Hill, Matthew Community of Residence: Sioux Falls, SD Submission Time: 1/4/2024 3:50:47 AM

Comment:

Hunting is vital to the economy of the region and is a means of adventure for the admiration of wild animals and wild places. I may never get to experience Alaska hunting but knowing that it's there is part of the American dream.

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Proposal 3: Oppose

Proposal 38: Oppose



Name: Hines, Albert Community of Residence: Argonne Submission Time: 1/10/2024 3:38:15 PM

Comment:

I would like to oppose proposals 3 and 38 for the reasons of the minimal impact the non resident has on the herd. The department has to consider the positive impact non residents have on the Alaska communities. Department needs to look into the impact of resident taking of female caribou and that of predators. Hunting Alaska many many years I've seen what the residents/natives have done in certain areas with all of today's modern hunting equipment. We need to work together to solve this decline and I personally believe it needs to start with predator control and residents taking fewer animals and no to very little taking of cows. Non resident impact on this herd is very very minimal. Also like I stated before the positive impact non residents have for these communities. 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



Name: Hinkle, Gabriel Community of Residence: Covington, Wa Submission Time: 1/3/2024 8:58:28 AM

Comment:

Non Resident take is miniscule. If there is such an urgent population crisis why would ADFG still allow hunting for cows? No on 38 and 13.

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: Hockett, Marcus Community of Residence: Bozeman, MT Submission Time: 1/13/2024 3:35:58 AM

Comment:

I am providing this comment to Oppose both Proposal 3 and Proposal 38. Closing the caribou season to non-resident hunters will likely have unindented consequences that negatively impact many Alaskan residents. Numerous businesses rely on revenue from non-resident hunters that will be lost if these proposals are approved. The continued closures will also concentrate more hunters in the areas that are still open, creating a lower quality experience for every hunter. Eventually, if the trend continues, significant revenue could be lost from reduced non-resident hunting license and tag sales. To reiterate what Alaska Department of Fish and Game already said, there is no biologically significant impact from the small amount of bull caribou harvested by non-residents in these units. These proposals are merely a distraction from the real problems. Focus should instead be placed on researching habitat changes, predator/prey relationships and what management changes could help increase cow caribou 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



Name: Holleman, Marybeth Community of Residence: Anchorage Submission Time: 1/4/2024 10:23:48 PM

Comment:

I strongly support Proposal 6, to suspend any hunting on the Mulchatna Caribou Herd for 5 to 10 years, until the herd has shown substantial recovery from its present low numbers. It's long past time for the BOG/ADFG to suspend all hunting on this herd, as it's been obvious for over a decade that the herd is in catastrophic decline. The 10-year wolf-killing program had no positive impact on the herd. And this mismanagement led to the state's atrocious massacre last spring of an astonishing 99 brown bears, black bears, and several wolves. If the state had suspended hunting on the Mulchatna caribou herd years ago, the herd would likely be recovering by now, and the wolves and bears would have been spared. But here we are, so I urge you to show the public you actually do want this herd to recover, that you're not just bowing to human hunting interests, and approve Prop. 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



Name: Hollon, Donna Community of Residence: Port Orchard, WA Submission Time: 1/10/2024 3:59:58 AM

Comment:

After researching and reviewing the information in Proposal #3 and #2,

I am writing to

coppose Proposal #3:

Non-Resident hunters had a severe reduction in Caribou limits in 2015, as well as a shortened Caribou hunting season. They were reduced from 5 Caribou yearly to a single bull Caribou per year. In Game Management Unit (GMU) 22 D/E they are allowed one bull (no cows) during the hunting season of August 1st - September 30th.

This does not make sense when residents can harvest/kill FIVE PER DAY !!

I do not understand how anyone could use or need 5 harvested caribou a day? This seems wasteful. Along with this, hunting from a snowmobile seems very indulgent unless the person has a real physical disadvantage and a real need for caribou meat or body parts. I support the native life style and understand that that those that live in the area should get priority when it comes to hunting and use of land. Having said that, the money that out of state people bring to the area is enormous. This would include adding to the success of hotel and the food service industry. The hoops they must jump through and the money spent for the privilege cannot be ignored. I would hope that a good portion of the money would go back into the conservation of such a beautiful state.

In addition the Caribou harvested by Non-Resident hunters are 4 to 15 per year for a ten-year period (2012 - 2022) which is an extremely small percentage of the total amount harvested from GMU 22 D/E.

☺I support Proposal #2 for these reasons:

Going back almost 40 years, regulations show that Alaskan Residents were and still are able to harvest 5 caribou every day and are allowed to take Cows from July 1 - March 31 and Bulls year round (no closed season).

Lastly, despite concern for declining caribou herd numbers, resident winter hunters requested to use snow machines for hunting caribou. This was granted with a new regulation in 2014 allowing snow machine use for Caribou hunting and shooting them from a non-moving snow machine.

I strongly oppose Proposal #3 and request that you would support Proposal #2.

Thank you for your very valuable time!

Donna Hollon

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: OpposeProposal 8: OpposeProposal 10:OpposeProposal 16: OpposeProposal 26: OpposeProposal 28: SupportProposal 31:OpposeProposal 40: OpposeProposal 41: Oppose



Name: Holmstead, Josh Community of Residence: Kaysville,UT

Submission Time: 1/2/2024 2:12:42 PM

Comment:

As a nonresident proposal 3 is deeply concerning. I oppose this proposal and recommend limiting tag permits in lieu of banning nonresidents from hunting this region.

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: Holscher, Rodger Community of Residence: Caldwell, ID Submission Time: 1/13/2024 1:26:01 AM

Comment:

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

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

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

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

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

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

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

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

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

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

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

Proposal 3: Oppose



Name: Homa, Weston Community of Residence: Monongahela, PA Submission Time: 1/9/2024 1:42:54 PM

Comment:

I am writing to oppose proposal #3 and #38. Non-residents hunters have such a vast minimal impact on the caribou population. If populations need to be improved, it's not the small amount of bulls that are harvested each year that make the impact. It's the thousands and thousands of cows and calves that r harvested by subsistence hunters or are taken by predators. Look at wildlife management in other US states to see how other ungulates have been managed over the years. Closing non resident hunting does not and will not effect this.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Honig, Benjamin Community of Residence: GLENWOOD Submission Time: 1/13/2024 3:07:50 AM

Comment:

Being a former resident and frequent visitor of Alaska, I have several friends in the guide and outfitting industry and understand how important tourism / destination hunting is to the state. Alaska is an amazing place that everyone should be able to experience. I feel game management can be achieved through other means and methods, with wildlife experts, biologists, and local tribes, villages, and communities. Less dramatic actions need to be considered before permanently closing access to the non-residents.

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

Proposal 3: Oppose



Name: Horak, Jace Community of Residence: Littleton, CO Submission Time: 1/13/2024 2:03:11 AM Comment:

I am commenting to oppose #3 and #38 with the below points:

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.

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Lack of Scientific Evidence: There is insufficient scientific evidence directly linking nonresident 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.



Name: Horton, Justin Community of Residence: Soldotna, Alaska Submission Time: 1/8/2024 10:24:58 PM Comment:

See attached.

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

Proposal 2: Support with Amendment Proposal 3: Oppose Proposal 28: Support Proposal 26: Support

I Justin Horton, Registered Guide #1332 *oppose Proposal #3* to close Non-Resident caribou hunting in GMUs 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A.

Resident caribou hunters have had a very generous 5 caribou per day limit for several decades. Nonresident hunters on the other hand continuously experience a reduction in hunting opportunities. In 2015, in the GMUs mentioned above, nonresident hunters were limited to a single bull per season, and the season's duration was also significantly reduced. This proposal is concerning, in its suggestion to eliminate access to a single demographic (nonresident) and the overall broadness of lumping all of these units together.

Out-of-state hunters are seeking large mature bulls and are harvesting less than 300 bull caribou in the entire 157,000 square miles that the WACH resides. Historically and biologically, nonresident hunting is not a contributing factor in the herds' decline; nor would eliminating this group's access have any credible impact. The major contributing factors, that can be controlled, that will have any relevant impact would be the reduction of resident harvests, no longer allowing the taking of cows, the closure of hunting by snowmachine during the winter months, and a more focused approach to predator control measures.

These past 20 years, since the herd's peak of 490,000 in 2003, all hunters, from the Villages to our nonresident guests, have the advantage of technological advancements: communications, snowmachines, aircraft, watercraft, and other all-terrain vehicles. Advancements and reasonable accessibility for all hunters have only increased the overall success of taking caribou. Also having an impact is the increased village populations in the region by placing a greater demand on the resource. The censuses from 2010 and 2020 show an increase in residents: Brevig Mission 62.8%; Teller 8.7%; Shishmaref 2.3%; Whales 15.9%; Deering 49.2%; Norvik 3.9%; Noatak 10.9%; Ambler 6.2%; Kiana 23.8%; Shugnak 3.8%; Kivalina 18.7%.

I *approve Proposal #2*, with amendments that only allow for the harvesting of bulls and a reduced winter season. A reduction in winter harvests would give the caribou a reprieve from being chased and run down by snow machines. With an additional amendment for the required reporting of all harvested caribou by resident hunters. Better accountability can only serve to better understand the impact all hunters have on the herd.

Of this herd's vast range, I have been guiding the past 15 years in the far SW corner in 22D/E. During this time, nonresident hunters in this area have annually harvested between 4-15 bull caribou. Some will argue that there is no caribou, only reindeer in this area, but I can, without a doubt, say that that is false. I believe that 2023's longer winter and above-average snowfall in the area pushed more caribou down from the north than in years past. This past August, I recorded more than 1500 caribou in one group. I have also observed older bulls that appear to be staying in this general area of 22D/E for the summer rather than migrating back north in the spring. While covering this area by land and air for 15 years, until 2023, I had yet to ever see a herd of caribou larger than 30 in the area I guided in. Since this 22D/E's harvest is limited by the number of mature bulls that hang around for the summer, even if the number of hunters

increased in this area there still will only be a small harvest of approximately 15 mature bull caribou.

It is our experience that the nonresident hunters coming to hunt caribou are hoping for the experience of a lifetime, they are also investing in our state and in the remote communities they travel to and from. From the sales of licenses, they help support wildlife management/ conservation programs in Alaska, metal locking tags, hotels, vehicle rentals, meals, goods, commercial flights, charter flights, the purchase of local arts & and crafts, and all other related expenses. There is also the impact this has on the guides and employees, all being Alaska residents and many from several local villages. Closing the nonresident caribou hunting in 22 makes no sense. This proposal has all the appearances of being arbitrary and punitive. Is this proposal saying "...*if the residents are finally willing to take a reduction, then the nonresidents should also be forced to take a (final) cut*"? Nonresidents are the most scrutinized, managed, and abiding of harvest reporting. With the nominal caribou taken, nonresident caribou hunters are the least of the WACH problems.

The BOG should also please consider the impact of these closures when nonresident seasons are shut down just months before an opener. Many of these nonresident hunters have made plans for these hunts for years; most purchases and contracts being secured well before the BOG meeting. As a matter of good business, short of extreme circumstances, the BOG should consider enacting any closure one calendar year from the time of decision.

I submitted and *approve of proposal #28,* to increase the harvest of grizzly bears in the area as an over-the-counter tag. This proposal would redefine the current restrictions and acknowledge a different approach to who and why these tags are being applied.

The current drawing system makes it exceptionally difficult for nonresident hunters to draw one of the 21 DB690 tags, and subsequently aid in needed predator management. With the current system, between 2018 and 2022 nonresidents harvested 3 grizzly bears. An increase in guides in the area has created a competition to obtain the limited 21 drawing tags. In 2023, the success rate of drawing a tag was 13%. Fish & Game has indicated that they want the draw to remain, but intend to increase the tags to 40. Increasing the tag count will not fix the problem. The majority of tags being applied for are by nonresidents who are in the area to hunt moose and caribou. These hunters are not necessarily targeting grizzlies as the main species, but rather as a "by-chance bonus" during a moose or caribou hunt.

A great example of how the current DB690 (bear) draw works is: that 51 nonresidents applied for DM855 (moose) and as an add-on, many of them also applied for DB690. Only 5 moose tags were issued in 2023. Those who drew DB690 and not the moose tag will not be coming to Alaska to hunt brown bears. Those tags will all go to waste for the fall of 2023 and the spring of 2024. That said once they draw the DB690 they have to wait out a year to apply for this tag and the following year can only apply for DM855. This does not include the NR caribou hunters

applying for DB690 as well. The number of hunters applying annually is increasing, so the fix is not to hand out more drawing permits.

Another factor to consider is that the majority of these tags if being used at all, are in the fall. If one is truly targeting brown bears as predator control, the best time to harvest these brown bears is late spring just before break up. Ironically, the same rule that allows hunters to use a snow machine to hunt caribou, wolves, and wolverines in GMU 22 cannot be used for brown bears in the same area. Why is the taking of those three species allowed, but not brown bears?

Having an over-the-counter brown bear tag allows nonresidents who missed the draw deadline to hunt brown bears. Most serious brown bear/ grizzly hunters want to know if they can obtain a tag or seek other areas in the state where they can. When planning a hunt of a lifetime these hunters want to know they will have an over-the-counter tag, not rely on a low success rate of drawing tag. Before the increase in guides in GMU22, there used to be unsubscribed tags that hunters could pick up as OTC. That will never happen again in this area even with the increase of drawing tags from 21 to 40.

Studies in 22B/C have documented that these bears are taking a significant amount of moose calves. It can be assumed that the same thing is also happening in 22D/E. Predation also accounts for caribou being taken. Logically, if DB690 was removed and instead over-the-counter tags were available, there should then be an increase in brown bears harvested. As always, with any over-the-counter situation, the risk of over-harvest would be a concern, as was voiced back in 2020 when residents were increased from 1-2 brown bears annually. In 2020 residents saw an increase in limit for 22D/E from 1 bear to two bears. After 2020 there was a decrease in harvest. Combined resident and nonresident hunters in 22D reported taking 12 bears in 2020; 10 in 2021, and 7 in 2022. While 22E reported 11 bears taken in 2020; 5 in 2021; and 2 bears in 2022. Thus far, overharvesting of grizzlies by residents has not been an issue, nor do I see it becoming one if DB690 is dropped. I believe we are on the cusp of a predator control program for the area if the drawing system remains as is. There is a high demand for moose in the area by locals and along with the WACH populations decreasing I see approving proposal #28 as a reasonable avenue to help with predation

Thank you for your consideration and for taking the time to read my comments.



Name: Howell, Kyler Community of Residence: Idaho Falls, Idaho Submission Time: 1/10/2024 11:48:56 PM

Comment:

I oppose proposal #3 and #38

I think this will negatively affect more things than just the local economy. The benefits do not outweigh the consequences.

I don't think there is enough evidence that numbers are down because of out of state hunting alone.

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Proposal 3: Oppose



Name: Hoyt, Tyler Community of Residence: Grand Haven, MI Submission Time: 1/4/2024 2:57:04 PM

Comment:

There is no scientific bases, or reason to prohibit non-resident hunters from taking caribou in AK. The total non-resident harvest is minimal, and not the cause for the decline in caribou numbers.

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

Proposal 3: Oppose



Name: Humphreys, Cara Community of Residence: Thorne Bay, AK Submission Time: 1/13/2024 4:54:39 AM

Comment:

I would like to see some more foresight given to closing Western Caribou to nonresidents. I believe that there is more affecting the caribou numbers than nonresident hunters. If we are concerned about numbers, I believe that there are less drastic alternatives; such as draw tags for nonresidents as well as considering the environmental impacts affecting them. It may also be important to acknowledge that if we close areas to people, fewer people will care about what happens there. This is important when projects like the road to Ambler are proposed. If proposal 3 is truly about caribou herd numbers, there would not be an open conversation about building destructive roads or mining projects.

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: Support Proposal 5: Oppose Proposal 10:
Support Proposal 11: Support Proposal 12: Support with Amendment Proposal 13: Oppose
Proposal 14: Oppose Proposal 15: Oppose Proposal 16: Oppose Proposal 17: Support Proposal
18: Oppose Proposal 19: Support Proposal 21: Support Proposal 22: Support with Amendment
Proposal 24: Oppose Proposal 25: Oppose Proposal 26: Support Proposal 30: Oppose
Proposal 34: Oppose Proposal 36: Support Proposal 37: Support Proposal 38: Oppose



Name: Hunt, Joshua Community of Residence: Centerfield Submission Time: 1/8/2024 4:23:54 PM Comment:

Proposal 3 Strongly Oppose

Proposal 38 Strongly Oppose

I strongly Oppose closing caribou hunting to non-resident hunters.

Harvesting a small number of mature Bull Caribou will have no effect on overall caribou population numbers. When a population is in decline, like the Western Arctic Caribou Herd, it's important to target bulls for harvest. A reproducing cow only produces one calf per year, but a single bull can breed with many cows. This means more bulls can be harvested from a population without impact to what wildlife biologists call "recruitment," the number of calves born each year. Reducing the harvest of Cow Caribou is the only Biological way to address this population decline.

The money that non-resident hunters bring to Alaska is essential to the small communities here. These hunts need to stay open for non-residents to harvest a small amount of Bull Caribou.

Proposal 2 Strongly SupportProposal 36 Strongly SupportProposal 37 Strongly Support

I strongly Support Proposal 2. We need greatly reduce the harvest of Cow Caribou to address the rapid population decline in this Western Arctic Caribou herd. The only way to increase the population of a herd is to protect the females that reproduce, and to increase the harvest of predators. When a population is in decline, like the Western Arctic Caribou Herd, it's important to target bulls for harvest. A reproducing cow only produces one calf per year, but a single bull can breed with many cows. This means more bulls can be harvested from a population without impact to what wildlife biologists call "recruitment," the number of calves born each year.

Residents should be reduced to 4 bull caribou per year until population goals are met.

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



Name: Huntin' Fool Community of Residence: Cedar City, UT Submission Time: 1/12/2024 1:16:57 AM

Comment:

We as a membership based organization of hunters and sportsmen are adamantly opposed to the elimination of non-resident caribou hunting opportunities as proposed in proposal #3 and proposal #38. We urge the Board to consider the inconsequential numbers of caribou currently harvested by non-residents in these units. It is critical to preserve the opportunity which provides jobs and revenue to rural Alaska communities

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

Proposal 3: Oppose



Name: Illingsworth, Nathaniel Community of Residence: Nampa, Idaho Submission Time: 1/2/2024 4:43:19 AM

Comment:

Please keep this open for non residents and limit it to residents. 5 caribou a day is a ridiculous allocation of game to residents. The one caribou non residents are able to harvest is not even coming close to the 5a day per resident.

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

Proposal 1: Oppose



Name: Iten, Ed Community of Residence: Kotzebue, Alaska Submission Time: 12/12/2023 11:31:42 PM Comment:

Proposal 19 (Unit 22 Tier II Muskox Trophy Destruction). I support this proposal and recommend an amendment to add Unit 23 Tier II Muskox hunts (TX107 + TX106) to no longer require trophy destruction. I believe these horn tips should be available for local arts and crafts.

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



Name: Jacobson, Billy Community of Residence: Severance, CO Submission Time: 1/13/2024 12:34:05 AM Comment:

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



Name: Jansen, Hunter Community of Residence: Alaska Submission Time: 1/12/2024 10:15:48 PM

Comment:

I vote no on proposal #3 as well as any additional proposals that restrict non resident hunting or inhibit access for these reasons. I was born into a hunting guide operation and am a fourth generation guide in Alaska. I and my Family are native alaskan big game guides dating back prior to statehood. Having non Resident seasons to take non resident hunters is a form of subsistence and traditional use for me and my family. Non Residents in unit 26a take less than 2% of the overall take of western Arctic caribou., there are three herds in unit 26a the teshekpuck and central Arctic herds are doing well. Only one third of the non resident harvest numbers in 26a are actually western Arctic caribou. By closing 26a this action eliminates two other herds that could be harvested. If this passes it will greatly affect me and my family's livelihood and our traditional use while doing nothing to improve caribou decline. As guides we harvest enough bears and wolves incidentally to more than reverse any negative affects on caribou harvest by our clients. In addition we facilitate over \$150,000 to the state fish and game programs budget each year through our clients alone. This greatly helps ADF&G efforts in doing essential studies to track populations and effects on those populations. At present resident hunters can legally harvest 1500 caribou per person per season and many of those will be cows. This in my opinion is irresponsible and unethical. According to the most recent census the average medium household income in kotzebue was \$111,000 that's 35% higher than residents of anchorage. To allow these oil rich villages to harvest ridiculous numbers of game while not allowing even one caribou to be harvested by a non Resident hunter is not necessary and is criminal in my opinion. At this time there is no present method of recording the subsistence take in these units, therefore there is no way to prove that the ANS is not being met, this alone is reason enough to not pass proposal #3 as well as any other proposals aimed at restricting or eliminating non resident hunters in any of the proposed areas that the western Arctic herd roams. Much of the meat from non residents is donated back to Alaskans who need the meat anyway.

I vote no on 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 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



Name: Jarnagin, Kevin Community of Residence: Mandeville, Louisiana

Submission Time: 1/9/2024 3:23:39 PM

Comment:

I am vehemently opposed to the proposition that would close non-resident caribou hunting in northern Alaska. I've hunted Alaska several times and would love to visit the state more to pursue caribou. Please reconsider and vote no on these propositions.

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

Proposal 3: Oppose



Name: Jarrold, Ian Community of Residence: Ione, CA Submission Time: 1/13/2024 5:53:26 AM

Comment:

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

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

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

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

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

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

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

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

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

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

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

Proposal 3: Oppose



Name: Jenkins, Tucker Community of Residence: AMERICAN FORK, utah

Submission Time: 1/11/2024 8:17:36 PM

Comment:

I have never hunted Alaska, im 23 and dream of that chance one day. Closing areas will only continue and one day all of Alaska could be closed. I feel that as long as the populations are healthy there is no reason to not allow hunting for all. Please take this into consideration.

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Name: Jensen, Justin Community of Residence: Lewiston, Idaho Submission Time: 1/2/2024 8:43:32 PM Comment:

Proposal 3 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:



Name: Jenson, Garth Community of Residence: Cedar City, Utah Submission Time: 1/3/2024 9:14:47 PM Comment:

Garth Jenson, I am addressing proposals 3 and 38.

I am opposed to both proposals based on the facts and numbers presented by the department that is put in charge of managing the states wildlife resources. Prior to the change to unit 23 in 2022 to nonresident hunting on federal land the harvest of caribou was 95% resident and 5% resident. Eliminating nonresident hunting will not address any issues of possible overharvest IF that is the primary concern of population decline. Along with that, the federal lands closure to nonresident hunting in unit 23 was not based off of science, studies, or recommendations brought by ADFG. Opponents of this closure warned that it would have no effect on the herd itself as a prior study (Fullman et al. Movement Ecology (2017)) documenting travel patterns and what obstacles were the primary reason for caribou migration patterns that deviated from historic migrating patterns. "Sport Hunting" was largely found to no effect on migration timing or pattern deviation. Since the federal lands closure in 2022 and nonresident hunting shrunk by 80% in unit 23 no positive effects have been seen on WAH. So I am perplexed as to why further restricting nonresident hunting within not only 23 (proposal 38) but now in units 21D, 22, 23, 24B, 24C, 24D, and 26A (proposal 3) would have the desired effect on the WAH? This is not sound science based management of the resource and ADFG sights that the limitation of harvest on caribou bulls by nonresidents at the prior 2022 levels when 300 bulls were harvested by nonresident hunters is biologically insignificant. This is based off the fact that the WAH is well above the 30:100 bull/cow ratio set by the exact working that is now proposing proposal #3.

I am asking the Board of Game to reject both proposal #3 and #38 and reinstate nonresident hunting on federal lands in unit 23. Lets listen to the professionals that have been put in charge of managing the wildlife resource. I would be in favor of limiting nonresident hunting if there was any evidence at all it is having a negative effect on the population and is a cause for the decline. But there is not.

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



Name: Johns, Cody Community of Residence: Idaho Submission Time: 1/2/2024 11:34:36 PM Comment:

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

Name: Johnson, Casey Community of Residence: Baker City, Oregon Submission Time: 1/8/2024 2:30:40 PM

Comment:

The proposal to ban nonresident hunters for caribou seems to be a short sided non solution to a seemingly widespread and complex problem. With the average 250 bulls taken by non residents each year, and current extended resident seasons, including subsistence practices taking a majority of cows and calves that are imperative in herd growth and maintenance of herd numbers, this proposal is the equivalent of throwing spaghetti noodles on the wall to see if they stick after not timing the process.

Those non-resident hunters are a key income source for resident outfitters and responsible for an influx of money in areas that would otherwise not have suitable replacements for these economic offsets.

Personally I hope to be able to hunt caribou in Alaska, and believe that these proposals will not only do nothing to sustain caribou numbers, but cause economic destruction to the local operators who facilitate these hunts.

These proposals are misguided and ineffective. Thank you for your time.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy: Proposal 3: Oppose Proposal 38: Oppose





Name: Johnson, Dante Community of Residence: Roseville, California Submission Time: 1/13/2024 4:30:47 AM

Comment:

From all the articles I've read and all the data I've seen. Non residents don't have the big of an impact on the wildlife compared to residents and I understand that numbers are low. Lowering how many tags are sold to non residents and how many residents can take would be a better first step. I understand non residents could be affecting the migration route could we come up with a course or something to educate people more to help migration. The community and state would loose a lot of revenue from nonresidents not going anymore also.

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

Proposal 2: Support Proposal 3: Oppose Proposal 4: Support with Amendment Proposal 5:Oppose Proposal 6: OpposeProposal 17: Support Proposal 18: SupportProposal 25:Oppose Proposal 26: SupportProposal 31: SupportProposal 38: OpposeProposal 209:SupportSupportProposal 31: SupportProposal 38: OpposeProposal 209:



Name: Johnson, Michael Community of Residence: Collinsville Oklahoma

Submission Time: 1/9/2024 2:10:01 AM

Comment:

This is a horrible idea

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

Proposal 3: Oppose



Name: Johnson, Robert Community of Residence: Boise, Idaho Submission Time: 1/8/2024 10:39:44 PM

Comment:

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

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

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

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

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

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

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

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

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

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

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

Proposal 3: Oppose



Name: Johnson, Trent Community of Residence: Duluth, MN Submission Time: 1/10/2024 1:04:55 AM

Comment:

There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population. Please remember we are all non-residents in 49 other states. Also, the proposals do not address the more significant impact of subsistence hunting, which accounts for a much larger annual harvest.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Johnson-Sullivan, Kaylene Community of Residence: Palmer Submission Time: 1/6/2024 3:58:10 PM Comment:

I strongly support Proposal 6 out of Bethel — the moratorium that closes the Mulchatna Herd to hunting for 5-10 years in Unit 18, to help rebuild the herd. This should take the place of culling bears and wolves as a means to boost herd numbers. Recent studies have proven there is no positive relationship between the kill numbers of any predator species and subsequent game harvests. The moratorium suggested in Proposal 6 costs the state nothing and allows nature to replenish itself after years of decline.

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



Name: Jouflas, Nick Community of Residence: Anchorage, AK Submission Time: 1/3/2024 1:29:16 AM Comment:

To whom it may concern,

I am writing in opposition of proposals 3, and 38. Non-Resident hunters make up a very small percentage of the overall harvest in the units at stake. These proposals are not backed by any data to support that shutting down Non-Resident hunting would have any impact on the overall health of the Western Arctic Caribou. I would ask that the Board please consider science based wildlife management, rather than conflicting user group objectives when making resource allocation decisions.

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

Proposal 3: Oppose



Name: Kahn, Anne Community of Residence: Lake Clark/Homer Submission Time: 1/4/2024 7:08:05 PM

Comment:

I support proposal 6 from Bethel to establish a 5-10 year moratorium on caribou hunting in the Mulchatna herd. Overharvest, particularly by sport hunting, should be considered as part of ADF&G's management program. I was saddened and sickened to learn of ADF&G's slaughter of nearly 100 bears in the spring of 2023 in southwestern Alaska in a so-called effort to boost caribou numbers. There was no scientific rationale for these actions, and the public was not informed about the decision. Making the information available to the public after-the-fact is irresponsible and unethical, and the cost is astronomical. I was born in SW Alaska and have been a long-time 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 6: Support Proposal 12: Support Proposal 16: Oppose Proposal 17: Oppose



Name: Kastenholz, Tim Community of Residence: Yelm, Washington Submission Time: 1/2/2024 11:20:20 AM Comment:

Closing units to non residents will have a larger negative impact on other units. It also limits opportunity for non residents and small businesses 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:



Name: Kawerak, Inc. Reindeer Herders Association (RHA) Community of Residence: Fairbanks, Alaska

Submission Time: 11/2/2023 10:35:38 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:



Reindeer Herders Association

Kawerak, Inc PO Box 948 Nome, Alaska 99762 (907) 302-2217 PH

(907) 443-4452 FX



November 1, 2023

Dear Members of the Alaska Board of Game,

The Reindeer Herders Association (RHA) of Kawerak, Inc., the Tribal non-profit corporation serving 20 Inupiaq, Yup'ik and St. Lawrence Island Yupik Tribes across the Bering Strait region of Northwest Alaska, is grateful for the opportunity to submit written comments strongly opposing "Proposal 18" as submitted by a hunting guide regarding 'caribou hunting' unit 22A near St. Michael and Stebbins. The RHA represents the interests of 18 Alaska Native reindeer herders, who collectively manage over 20,000 reindeer on the Seward Peninsula, as they have continued to do for many generations. Reindeer herding is an integral part of the cultural fabric of many of our communities, in addition to providing a key source of food security for 31 Tribes in the Bering Strait and Northwest Arctic regions.

Kawerak's Reindeer Herders Association is strongly opposed to Proposal 18. The proposal suggests the ostensible opening of "caribou hunting" in the '22A Remainder,' beyond the current permit-only hunting of caribou in 22A 'north of Golsovia River drainage' for residents and non-residents in limited seasons. While acknowledging that "the Western Arctic Caribou Herd (WAH) has been in decline" and that "this is not the time to expand the regulation," the author argues that the impetus for the change is that the current limits should simply have "never been instated." The author cites the existence of caribou in the Andreafski Hills in the late 1800s, the reported rare sighting of caribou from different villages in the region (it is unclear whether the author considers these sightings to be 'wild reindeer' or 'caribou'), and the purported improper hunting that the author claims to still exist despite the regulation, as supporting evidence for further liberalizing hunting in the region. To assume a contemporary basis for caribou hunting based on historic ranges from the 1800s and regional sightings would, by itself, be conjecture. While RHA wouldn't necessarily contest the existence of illegal hunting in the region despite the restrictions on caribou hunting, this is certainly not a basis to reward this behavior.

The RHA's perspective on why the 22A Remainder should stay closed to caribou hunting is more basic: There remains a sizeable, privately-owned reindeer herding operation co-owned by the Tribes of St. Michael and Stebbins in conjunction with an individual herder. Reindeer are private property, not under the oversight of Alaska Department of Fish and Game (ADFG) directly, and not allowable for taking without the express, written permission of the owners. From phone conversations with Alex Hansen, an ADFG Biologist, it is RHA's understanding that the WAH hasn't been recorded south of Unalakleet in decades. It is the RHA's view that the current regulations in 22A are a recognition on the part of ADFG of the large reindeer herd in this region and the extreme rarity, if ever, of caribou migrations in the region on the part of the WAH. RHA cherishes its strong working relationship with ADFG and fears the impact on the sizeable, privately managed herd by confusing hunters on distinguishing reindeer and caribou, or risk effectively destroying private property. The author's seeming assertion that these are 'wild' reindeer, and therefore indistinguishable from caribou, is without basis, particularly as these are reindeer that are permitted to graze on wild ranges in the region (ie. They are not penned-in reindeer.) In frequently describing the herds at issue as "caribou/wild reindeer," the author gives away the risk outright: even a hunting guide is unable to easily understand the difference between wild-ranging reindeer operating under land agency-provided grazing permits and privately owned, ADFG-managed caribou herds. This not only risks jeopardizing a permitted, supported industry in the region, but risks opening a pandora's box for law enforcement, who would be tasked with delineating between reindeer and caribou in regulating hunts.

RHA implores the Board of Game to not upset the balance struck with current 22A regulations. These regulations, as they stand, allow for an Alaska Native reindeer industry to function in the region, as it does, without risk of hunting guides and residents frequently confusing private livestock with ADFG-regulated caribou.

Nathan Baring Nathan Baring

Nathan Baring Program Director of Kawerak's Reindeer Herders Association



Name: Keller, Brandon Community of Residence: Auburn, wa Submission Time: 1/10/2024 1:00:50 AM Comment:

I am opposing proposal #3 & #38

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

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

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

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

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

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

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

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

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

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

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

Proposal 3: Oppose



Name: Kelso, Andy Community of Residence: Graham, WA Submission Time: 1/9/2024 4:37:51 AM

Comment:

I oppose proposals 3and 38. Non resident hunting of caribou bulls has a negligible impact on the population. Cow hunting by residents should be looked at if there is concern of population numbers.

This would also have a significant economic impact across the state.

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: Kelso, Ethan Community of Residence: Nome Submission Time: 1/2/2024 7:30:56 PM

Comment:

Proposal 19: I strongly oppose this proposal. I would argue that trophy destruction should be removed entirely from this hunt. This proposal would require the surrendering of more horn then currently required, further lessening the size/amount of items that can be made from the horns.

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

Proposal 2: Oppose Proposal 3: Oppose Proposal 4: Support Proposal 5: Oppose Proposal 12: Oppose Proposal 13: Oppose Proposal 18: Support Proposal 19: Oppose Proposal 20: Oppose Proposal 21: Oppose Proposal 22: Oppose Proposal 23: Oppose Proposal 24: Support Proposal 25: Oppose Proposal 27: Support Proposal 28: Oppose Proposal 29: Support Proposal 30: Support Proposal 33: Oppose Proposal 38: Oppose Proposal 39: Support Proposal 40: Support Proposal 41: Support Proposal 42: Support



Name: Kemmis, Alyssa Community of Residence: Billings MT Submission Time: 1/9/2024 10:37:50 PM

Comment:

I oppose proposals 3 and 38 because of a Lack of Scientific Evidence: There is insufficient scientific evidence directly linking non-resident hunting to the decline in the caribou population. Furthermore it would be detrimental to the communities that thrive off of non residential hunters visiting and experiencing the area. They contribute to the economy by spending money in rural areas or with charter companies that often have families to support. There are better alternatives to these proposals.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Kennedy, Alexander Community of Residence: Kaysville, Utah

Submission Time: 1/13/2024 6:50:32 AM

Comment:

I oppose the closure of non-resident caribou hunting in northwest Alaska. As a former resident of the state and avid hunter and conservationist, I treasure the opportunity to return to Alaska to hunt caribou and other species. Alaska and her wildlife are a national treasure that should be shared with future generations, including non-residents.

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

Proposal 3: Oppose



Name: Kennedy, Dan Community of Residence: Vacaville California Submission Time: 1/8/2024 10:08:39 PM

Comment:

3&38. I am strongly against not allowing out of state hunting. We may as much as quadruple the amount of money for these tags. Money which help fund habitat and protection of wildlife. These animals belong to ALL of us not just local residents. Thank you.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Kennedy, Ethan Community of Residence: Norwood, colorado Submission Time: 1/8/2024 1:43:17 AM Comment:

I OPPOSE all restrictions on the opportunity for non resident caribou hunting. Without non resident hunting many local communities will lose income that is brought in by nonresident hunters. They will also lose the meat that is typically donated from non resident 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



Name: Kerley, Brian Community of Residence: Fairbanks Alaska Submission Time: 1/12/2024 8:39:58 PM

Comment:

I vote no on proposal #3 along with any further proposals that restrict non resident hunting for the following reasons. I am a born and raised Alaska native and a big game guide. Having non Resident seasons to take non residents hunters is a form of subsistence and traditional use for me and my family. Non Residents take less than 4% of the overall take of caribou. If this passes it will take donated meat from non Resident hunters out of my freezer as well as hurt fish and games budget to do the research and studies necessary to even have a caribou count in the first place. Non residents pay thousands of dollars to the state per hunter to hunt in Alaska where as residents pay less than \$100 each to hunt each year. I feel that by closing the non resident hunting season it will not do anything to improve game numbers. It in

My opinion will only devastate families like my own who rely on this revenue and resources to feed our families as well as the states economy and small businesses.

I vote no on 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:



Name: Ketterling, Tyler Community of Residence: Mesa Arizona Submission Time: 1/12/2024 12:42:32 AM Comment:

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 3: Oppose



Name: Kier, Annie Community of Residence: Denver, Colorado Submission Time: 1/13/2024 4:21:03 AM Comment:

Please do not support #3 and #38

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

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

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

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

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

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

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

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

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

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

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

Proposal 3: Oppose



Name: Killian, Shawn Community of Residence: Soldotna, Alaska Submission Time: 1/8/2024 12:44:27 AM Comment:

See Attached

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

Proposal 2: Support Proposal 3: Oppose

Proposal 28: Support

I oppose Proposal #3 (5 AAC 85.025) Hunting season and bag limits for Caribou. This proposal is requesting to close Non-resident caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A.

Numerous restrictions have been put in place on the non-resident hunters since the early 1990s with only 1 or 2 changes for Alaska residents in the units/sub-units in this proposal. All information about the following changes were located in past Alaska hunting regulations. The information about the changes to non-residents hunting restrictions will be described by units/sub-units.

In unit 21 D Remainder, caribou harvesting limits by non-residents has already been severely reduced in the 2015-2016 hunting regulations. Prior to these regulations, harvest limits were set at 5 caribou (bulls and cows), the cow harvest season were from July 1-May 15, and there was no closed season for bulls. The 2015-2016 hunting regulations decreased harvest limits to one (1) bull, eliminated the harvesting of cows, and initiated a harvest season for bulls (August 1-September 30). This changes the bull harvesting season from 365 days a year down to 61 days a year and cow harvesting season from 319 days to zero days. These regulations severely limited the number of animals allowed and the length of time to harvest the animals.

In unit 22, caribou harvesting limits by non-residents has already been severely reduced in the 2015-2016 hunting regulations. Prior to these regulations, harvest limits were set at 5 caribou (bulls and cows), the cows had a variable harvest season, and there was no closed season for bulls. With the large amount of different harvest dates and cow and bull caribou harvest for the sub units of 22 in 2014-2015 (see appendix A). The 2015-2016 hunting regulations decreased harvest limits to one (1) bull, eliminated the harvesting of cows, and initiated a harvest season for bulls (August 1-September 30; with some sub units not listed and were advertised as to be announced). These regulations severely limited the number of animals allowed and the length of time to harvest the animals in this unit.

Unit 23 had a large number of changes for non-resident and only one change for Alaska resident hunters. The first change affecting both non-resident and resident hunters was the activation of the Noatak Controlled Use Area (CUA) in the early 1990s. In the 1995-1996 hunting regulations, the Noatak CUA extended from approximately Hotham Inlet to the mouth of Sapun Creek. Due to poor description in regulations, the distance from the river is unknown (see appendix B; Figure 1). In 2006-2007, the nonresident harvest limits went from a total of 5 caribou (including cows) to two caribou (including cows). In 2010, the Noatak CUA further restricted the use of aircrafts from landing within 5 miles on each side of the Noatak River from August 25- September 15 to August 15- September 30. In the 2015-2016 hunting regulations, non-residents were harvest limits were restricted again down to one (1) bull caribou. The Noatak CUA boundary expanded to include Cutler River. Changes in the 2015-2016 hunting regulations drastically decreased the hunting season for non-resident hunters. As of the 2023-2024 hunting regulations, the Noatak Controlled Use Area (CUA), extends 5-miles on either side of, and including, the Noatak River beginning at the mouth of the Agashashok River, and extending upstream to the mouth of Nimiuktuk River. Which eliminates access of non-resident and resident hunters to a major access point of Unit 23 (see appendix B; Figure 2). From the early 1990s to present, hunting regulations have already severely restricted non-resident hunters harvesting limits and access, compared to residents.

In Unit 26A, Federal rules were implemented on hunting in 1990s to all non-Federally qualifies users. In 2006-2007 the use of aircraft was restricted for transporting hunters and gear during the period of

August 15- October 15. 2014-2015 harvest dates for cow caribou were July 1 - May 15 and bull caribou was no closed season. The non-resident harvest limit was decreased to one (1) bull caribou, in 2015-2016, with a hunting season from July 15- September 30.

Both Unit 23 and 26A have had major changes to Alaska residents and non-residents with minor changes to Federally qualified users. See regulatory history of the Wildlife Special Action WSA21-01 (see appendix C).

In units 24B Remainder, 24C and 24D non-residents had a decrease in hunting season and harvest limit. The caribou harvest limit in the subunits of 24 described above in 2014-2015 was 5 caribou (cows and bulls) to one (1) bull caribou only in 2015-2016. The hunting season in 2014-2015 for cows was July 1-May 15 and bulls was no closed season. The 2015-2016 hunting season changed to no harvesting of cows and bull harvest was changed to August 1-September 30.

The information provided above demonstrates that non-resident hunters have been severely restricted with regard to harvest limits and open seasons. I'm in favor of reducing the proposed harvest limits for Alaska residents as stated in Proposal #2. Restricting the harvest of cow caribou after rut will help the population of caribou due to the fact that most cow caribou after rut are pregnant. Instead of eliminating all non-resident harvesting of caribou in the above units, there are other ways to support the population of the Western Artic Caribou herd. Some examples are: (1.) non-residents allowed to harvest wolves with no tag fee applied; (2.) Grizzly/brown bear tag DB690 should be moved to an over-the-counter tag instead of the draw tag (current Proposal #28); (3.) making it illegal to harvest swimming caribou with a firearm using rimfire cartridges in a motor-driven boat and running the caribou down via snow machine; (4.) stricter harvest reporting requirements for all parties (non-residents, Alaska residents and subsistence) harvesting caribou.

As an Alaska resident, if this proposal passes it will be taking away my lively-hood by not allowing nonresident hunters to hunt in the Game Units affected. Additionally, non-residents provide substantial economic revenue to the areas in rural Alaska towns and villages.

OPE	N TO:	- DE		TE ONLY	B = RESI	DENTS AND NONRESIDEN	ITS	N = NON	RESIDENTS ONLY
OPEN TO:	UNIT/	R = RESIDENTS ONLY B = RESIDENTS AND NONRESIDENTS BAG LIMIT AND SPECIAL INSTRUCTIONS					PERMIT/ HUNT #*	OPEN SEASON	
-	ibou		e Day A	irborne in c	ffect Jan. 1 - Ap	ril 15, see page 19. of sex must remain naturally attu I of either sex; "bull" means ma	ached to the	e meat. "cow" means	a female caribou.
R	22A	The second second				Bulls		HT**	no closed seaso
R	22B	remainder	romainder		Five caribou per day Cows		HT**	July 1-May 1	
N	220	remainder		Five caribou total Bulls Cows			HT	no closed seaso	
N							HT	July 1-May 1	
R					And	Five caribou per da	V	HT**	Oct 1 - April 3
R	0.00	west of Golovnin Bay, west of the west banks of Fish and Niukluk rivers below the Libby River, and excluding the Niukluk River drainage above, and including, the Libby River drainage.			liukluk	OR Five caribou per da however, cows may not taken May 16-June 30	У	HT**	may be announce
N	22B				er drainage	Five caribou total		HT	Oct 1 - April 3
N					Five caribou total howe cows may not be taken Ma June 30		нт	may be announce	
R	220	Five carib	ou per day however, cows may not be taken May 16-June 30			HT**	may be announce		
N						ot be taken May 16-June 30		HT	may be announce
R			Five caribou per day				HT**	Oct 1 - April 3	
R		River drainage		L Fiv	ve caribou per day however, cows may not be ten May 16-June 30		HT**	may be announce	
N	220					HT	Oct 1 - April 3		
N				L Five caribou total however, cows may not be taken May 16-June 30		HT	may be announce		
R		drainage (excluding the Pilgrim River drainage) and the Agiapuk River drainages		Five ca	ribou per Bulls		HT**	no closed seaso	
2					day Cows		HT**	July 1-May 1	
N				River	Five caribou total Bulls		HT	no closed seaso	
đ	<u> </u>			La series and	Cows		HT	July 1-May 1	
	22D /	remainder	Five caribou per day however, cows may not be taken May 16-June 30			HT**	may be announce		
1			Five caribou total however, cows may not be taken May 16- June 30			HT	may be announce		
		east of and including the Sanaguich Five c			Five caribou per day Bulls	HT**	no closed seaso		
2	22E Å				por day	Cows	HT**	July 1-May 1	
-		Five caribou total Bulls				HT	no closed seaso		
		Cows			HT	July 1-May 1			
2	22E n	emainder			HT**	may be announce			
			Five caribou total however, cows may not be taken May 16- June 30 Yukon River and hunt caribou in that area, you do not need c must register with ADF&G or an authorized representation			нт	may be announce		

In Unit 22, snowmachines may be used to position caribou, wolf, and wolverine for harvest and they may be shot from a stationary snowmachine.

112 2014-2015 Alaska Hunting Regulations

effective July 1, 2014 through Ju

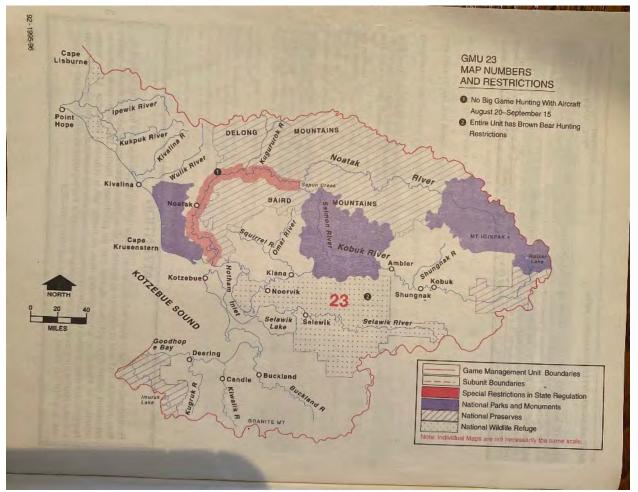


Figure 1. The Noatak Controlled Use Area; 1995-1996 Hunting Regulations.

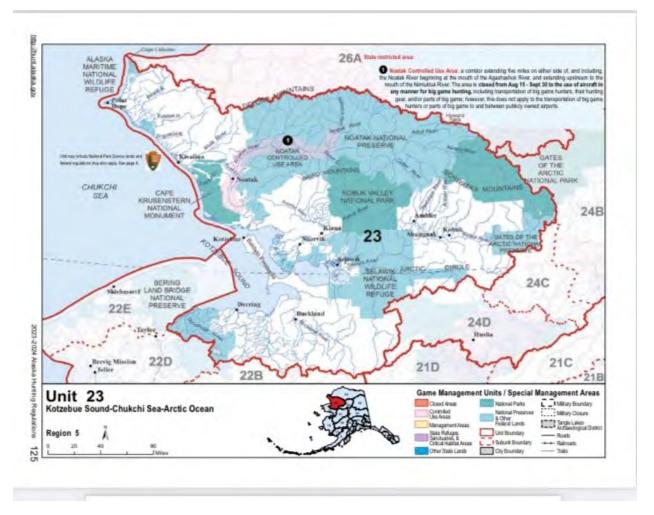


Figure 2. The current Noatak Controlled Use Area; 2023-2024 Hunting Regulations.

Regulatory History

In 1990, the caribou hunting season in Unit 23 and 26A was open year-round with a five caribou per day harvest limit and a restriction on the harvest of cows May 16-June 30.

In 1994 the Federal Subsistence Board (Board) adopted Proposal P94-82 with modification to allow motordriven boats and snowmachines to be used to take caribou in Unit 26 and to allow swimming caribou to be taken with a firearm using rimfire cartridges in Unit 26. (Swimming caribou could be taken with a firearm using rimfire cartridges in Unit 23 since 1990).

In 1995, the Board adopted Proposal P95-51 to increase the caribou harvest limit from five to 15 caribou per day in Unit 23 so that subsistence hunters could maximize their hunting efforts when caribou were available. The Board also adopted Proposal P95-64 to increase the harvest limit from 5 caribou per day to 10 caribou per day in Unit 26 to increase harvest opportunity for subsistence hunters.

In 1995 the Board also adopted Proposal P95-62 which closed the area east of the Killik River and south of the Colville River to caribou hunting by non-Federally qualified users from Aug.1-Sep. 30. This closure was enacted to prevent non-Federally qualified users from harvesting lead animals, which may have caused the migration to move away from the area that local subsistence users hunted in Unit 26A. The justification was to allow for caribou migrations to take their normal route into Anaktuvuk Pass.

In 1997, the Board adopted Proposal P97-66 with modification to provide a customary and traditional use determination for caribou in Unit 23 for rural residents of Unit 21D west of the Koyukuk and Yukon rivers, Galena, Units 22, 23, 24 including residents of Wiseman, but not other residents of the Dalton Highway Corridor Management Area and Unit 26A (**Map 2**).

In 2000, the Board adopted Proposal WP00-53 with modification, allowing the use of snowmachines to position a hunter to select individual caribou for harvest in Units 22 and 23. This was done to recognize a customary and traditional practice in the region.

In 2006, the Board adopted Proposal WP06-65 which opened the area east of the Killik River and south of the Colville River to non-Federally qualified users. The 1995 closure was lifted for several reasons. First, due to changes in land status, lands formerly managed by BLM were transferred to Alaska Native corporations or the State pursuant to the Alaska Native Claims Settlement Act or the Statehood Act, respectively. After these land transfers, only lands east of Anaktuvuk Pass were affected by the closure, making the closure less effective. Second, the population was at a point where it could support both subsistence and non–subsistence uses.

In 2013, an aerial photo census indicated significant declines in the Teshekpuk Caribou Herd (TCH), Western Arctic Caribou Herd (WACH), and possibly the Central Arctic Caribou Herd (CACH) populations (Caribou Trails 2014). In response, the Alaska Board of Game (BOG) adopted modified Proposal 202 (RC76) in March 2015 to reduce harvest opportunities for both Alaska residents and nonresidents within the range of the WACH and the TCH. These regulation changes – which included lowering bag limits for nonresidents from two caribou to one bull, reductions in bull and cow season lengths, the establishment of new hunt areas, and prohibiting calf harvest – were adopted to slow or reverse the population decline. The regulatory changes took effect on July 1, 2015.

In 2015, four special actions, WSA15-03/04/05/06, requesting changes to caribou regulations in Units 23, 24, and 26, were submitted by the North Slope Council and approved with modification by the Board, effective July 1, 2015. Temporary Special Action WSA15-03 requested designation of a new hunt area for caribou in the northwest corner of Unit 23 where the harvest limit would be reduced from 15 to five caribou per day, the harvest season would be shortened for bulls and cows, and the harvest of calves would be prohibited. The Board did not establish a new hunt area, instead applying the restrictions to all of Unit 23 and also prohibited the harvest of cows with calves. These State and Federal regulatory changes were the first time that harvest restrictions had been implemented for the WACH in over 30 years.

Temporary Special Action WSA15-05 requested that the bull caribou harvest limit in Unit 26A be reduced from 10 caribou per day to 5 caribou per day, the cow harvest limit be reduced to 3 per day, the harvest seasons for bulls and cows be reduced, and the take of calves and cows with calves be prohibited. Compared to the new State caribou regulations, it requested 3 additional weeks to the bull harvest season (Dec. 6-31). These special actions took effect on July 1, 2015.

In 2015, the Northwest Arctic Council submitted a temporary special action request (WSA16-01) to close caribou hunting on Federal public lands in Unit 23 to non-Federally qualified users for the 2016/17 regulatory year. The Council stated that their request was necessary for conservation purposes but also needed because nonlocal hunting activities were negatively affecting subsistence harvests. In April 2016, the Board approved WSA16-01, basing its decision on the strong support of the Northwest Arctic and North Slope Councils, public testimony in favor of the request, as well as concerns over conservation and continuation of subsistence uses.

Six proposals (WP16-37, WP16-48, WP16-49/52, WP16-61, and WP16-63) concerning caribou regulations in Units 23 and 26A were submitted to the Board for the 2016-2018 wildlife regulatory cycle. The Board adopted WP16-48 with modification to allow the positioning of a caribou, wolf, or wolverine for harvest in Unit 23 on BLM lands only. Proposal WP16-37 requested that Federal caribou regulations mirror the new State regulations across the ranges of the WACH and TCH (Units 21D, 22, 23, 24, 26A, and 26B). The Board adopted Proposal WP16-37 with modification to reduce the harvest limit to five caribou per day, restrict bull harvest during rut and cow harvest around calving, prohibit the harvest of calves and the harvest of cows with calves before weaning (mid-October), and to create a new hunt area in the northwest corner of Unit 23. The Board took no action on the remaining proposals (WP16-49/52, and WP16-61, and WP16-63) due to action taken on WP16-37.

In June 2016, the State submitted a special action request (WSA16-03) to reopen caribou hunting on Federal public lands in Unit 23 to non-Federally qualified users, providing new biological information (e.g. calf recruitment, weight, body condition) on the WACH. The State specified that there was no biological reason for the closure and that it could increase user conflicts. In January 2017, the Board rejected WSA16-03 due to the position of all four affected Councils (Northwest Arctic, North Slope, Seward Peninsula, and Western Interior) as well as public testimony and Tribal consultation comments opposing the request. Additionally, the Board found the new information provided by the State to be insufficient to rescind the closure.

In January 2017, the BOG adopted Proposal 2, requiring registration permits for residents hunting caribou within the range of the Western Arctic and Teshekpuk herds in Units 21, 23, 24, and 26 (a similar proposal was passed for Unit 22 in 2016). ADF&G submitted the proposal in order to better monitor harvest and improve management flexibility. The BOG also rejected Proposal 3 (deferred Proposal 85 from 2016), which would have removed the caribou harvest ticket and report exception for residents living north of the Yukon River in Units 23 and 26A). Also in January 2017, the BOG rejected Proposal 45, which proposed requiring big game hunting camps to be spaced at least three miles apart along the Noatak, Agashashok, Eli, and Squirrel Rivers. The proposal failed as it would be difficult to enforce.

In March 2017, the Northwest Arctic and North Slope Councils submitted temporary special action requests (WSA17-03 and -04, respectively) to close caribou hunting on Federal public lands in Unit 23 and in Units 26A and 26B, respectively, to non-Federally qualified users for the 2017/18 regulatory year. Both Councils stated that the intent of the proposed closures was to ensure subsistence use in the 2017/18 regulatory year, to protect declining caribou populations, and to reduce user conflicts. The Board voted to approve WSA17-03 with modification to close all Federal public lands within a 10 mile wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage, to caribou hunting except by Federally qualified subsistence users for the 2017/18 regulatory year. The Board considered the modification a reasonable compromise for all users, and that closure of the specified area was warranted in order to continue subsistence use. The Board rejected WSA17-04 due to recent changes to State regulations that should reduce caribou harvest.

In April 2018, the Board adopted Proposals WP18-46 with modification and WP18-48 (effective July 1, 2018). Proposal WP18-46 requested closing caribou hunting on Federal public lands in Unit 23 to non-Federally qualified users (similar to WSA16-01 and WSA17-03). The Board adopted WP18-46 with the same modification as WSA17-03 (see above) as the Northwest Arctic, Western Interior, and Seward Peninsula Councils as well as the village of Noatak supported this modification and viewed the targeted closure as effectively addressing user conflicts and the continuation of subsistence uses. The Board also adopted WP18-48 to require State registration permits for caribou hunting in Units 22, 23, and 26A to improve harvest reporting and herd management, and to align with State regulations.

Also in 2018, the Board considered proposal WP18-57, which requested that caribou hunting on Federal public lands in Units 26A and 26B be closed to non-Federally qualified users. This proposal was submitted by the North Slope Council to ensure continuation of subsistence, protect the caribou herds, and reduce user conflicts. The Board rejected WP18-57, choosing to allow time to evaluate the effects of recently implemented harvest restrictions. In addition, the Board expressed concern that closing Federal lands would shift users to State lands, increasing conflict.

In January 2020, the BOG adopted Proposal 20 to open a year-round resident season for caribou bull harvest in Unit 23 under State regulations. The BOG also adopted Proposal 24 as amended to remove the restriction on caribou calf harvest in Units 22, 23, and 26A. Proposal 28, which would have eliminated the caribou registration permit in Units 23 and 26A for North Slope resident hunters, was not adopted by the BOG, due to an ongoing need for harvest data.

In April 2020, the Board adopted Proposal WP20-46 to open a year-round bull season and permit calf harvest for caribou in Unit 23. Creating a year-round season for bulls was intended to allow for harvest of bulls when caribou migration had been delayed, alleviating harvest pressure on cows. The prohibition on calf harvest was lifted in order to permit taking of calves that had been orphaned or injured.

In summary, since 2013, restrictions have been placed on caribou hunting in Units 23 and 26A under both State and Federal subsistence regulations. Recent relevant changes include:

Federal Subsistence regulatory changes:

- Reduction in cow and bull season length in 26A (2015)
- Reduction of caribou harvest limit to 5 per day in both Units 23 (2015) and 26A (2016)
- Requirement for Federally qualified subsistence users hunting caribou under Federal regulations to have a State registration permit (RC907) in both Units 23 and 26A in order to improve monitoring (2018)
- Closure of limited areas in Unit 23 centered on the Noatak River to caribou hunting by non-Federally qualified users in order to reduce user conflict (2017)
- Opening a year-round bull season in Unit 23 to allow for harvest of younger bulls when caribou migration has been delayed, and to alleviate harvest pressure on cows (2020)

State regulatory changes:

- Reduction in cow and bull season length in both Units 23 and 26A (2013)
- Reduction of caribou harvest limit to 5 caribou per day in both Units 23 and 26A (2015)
- Requirement for registration permit under State regulations throughout the range of the WACH and TCH (2017)
- Opening a year-round harvest for bulls in Unit 23 (2020)

A non-resident caribou hunt remains open in both Units 23 and 26A under State regulations, although the bag limits for nonresidents was reduced from two caribou to one bull in 2013. The results of closure requests for caribou in Units 23 and 26 made to the Board since 2016 are documented in **Table 1** and **Table 2**, below.

Table 1. History and outcomes of closure requests for caribou on Federal public lands in Unit 23 since 2016. All three requests were submitted by the Northwest Arctic Council. FQSUs = Federally Qualified Subsistence Users; NFQUs = non-Federally qualified users.

Proposal or	Proposed	Proponent	Board Action
Special Action	Action	Rationale	
Request			
WSA16-01	Close Unit 23 to NFQUs for 2016/2017 regulatory year	Conservation, impact of nonlocal hunting	Approved
WSA17-03	Close Unit 23 to NFQUs for 2017/18 regulatory year	Ensure subsistence use, protect declining caribou, reduce conflict	Approved with geographical limitation/modification (Noatak, Eli, Agashashok, and Squirrel rivers closures)
WP18-46	Close Unit 23 to NFQUs	Ensure subsistence use, protect declining caribou, reduce conflict	Approved with geographical limitation/modification (Noatak, Eli, Agashashok, and Squirrel rivers closures); closure is still in place

Table 2. History and outcomes of recent closure requests for caribou on Federal public lands in Unit 26A since 2017. Both requests were submitted by the North Slope Council. NFQUs = non-Federally qualified users.

Proposal or Special Action Request	Proposed Action	Proponent Rationale	Board Action
WSA17-04	Close 26A (and 26B) to NFQUs	Continuation of subsistence, protect declining caribou populations, and reduce user conflicts	Reject
WP18-57	Close 26A (and 26B) to NFQUs	Continuation of subsistence, protect declining caribou populations, and reduce user conflicts	Reject



Name: Kimmell, Sam Community of Residence: Endicott, WA

Submission Time: 1/9/2024 4:48:30 AM

Comment:

I strongly oppose the following proposals: #3 and # 38.

There is little to no evidence to support the closure of a sustainable caribou hunt in these units. Please consider the hunter opportunity in an increasingly restrictive world as it relates to historic use.

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

Proposal 3: Oppose



Name: KING, Jason Community of Residence: Chilliwack, BC Submission Time: 1/13/2024 5:24:15 AM Comment:

In my opposition to proposals 3 and 38, being a resident of BC after losing our Grizzly Bear hunt to a political agenda vs a scientific reason.

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 nonresident hunting to the decline in the caribou population.

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

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

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

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy: Proposal 3: Oppose Proposal 38: Oppose



Name: Kinsel, Karl Community of Residence: Denver, CO Submission Time: 1/6/2024 8:18:55 PM

Comment:

I, along with thousands of other sportsmen, am strongly opposed to the proposed non-resident closures for caribou hunting. I believe they are unnecessary and will only serve to appease a small group of residents who complain. I hunted out of Kotz this fall with my family and had a great hunt. We spent a number of days and a fair amount of money in town before and after our hunt. Non-residents would hate to see this opportunity, and the money that comes with it, thrown away.

Thank you,

Garrison Kinsel

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: Kleinwachter, Brian Community of Residence: Middle River MN

Submission Time: 1/11/2024 7:37:52 PM

Comment:

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

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Proposal 3: Oppose



Name: Klimek, Brad Community of Residence: Albertville, MN Submission Time: 1/9/2024 2:20:09 PM Comment:

I'm opposed to proposals 3 and 38 for the following reasons....

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

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

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

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

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

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

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

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

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

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

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

Proposal 3: Oppose



Name: Kline, Luke Community of Residence: Bayfield, CO Submission Time: 1/13/2024 5:06:06 AM Comment:

To whom it may concern:

I am writing to OPPOSE both proposal #3 and #38, the closure of caribou hunting to nonresidents in those units. Non-resident hunting has a very limited impact on herd population dynamics but brings AK funds through license sales, flights, gear, lodging and so many other economic avenues. If the concern is population numbers, a short term solution could be to reduce tag allocation in those units and conduct a study to determine the population reduction causes (likely nothing to do with hunter pressure/success). Scientific research should be the basis for all wildlife management decisions and there is a lack of evidence that would warrant limiting nonresident hunting. This is not a black and white issue and should be approached with more comprehensive and collaborative solutions. Other factors that contribute to population changes/dynamics should be considered before drastic, evidence-less measures are taken. Please consider the economic benefits that directly support wildlife in the state of Alaska with the closure to non-resident hunting.

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

Proposal 3: Oppose



Name: Knapp, Ryan Community of Residence: Cobleskill NY Submission Time: 1/5/2024 9:33:34 PM

Comment:

I believe the closures of these hunting grounds would be a gross overreach of the Government and is not back by science. I strongly object to both proposals.

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

Proposal 3: Oppose

Proposal 38: Oppose



Name: Knowles, Eddie Community of Residence: Missoula, Montana Submission Time: 1/3/2024 12:24:08 AM

Comment:

Taking away possible hunting opportunities from non-residents (who pay a lot of money), but still allowing locals to kill more of a certain sex's of species makes no sense l at all. It seems that there is a one sided agenda in the boards.

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: Knowles, Eddie Community of Residence: Missoula, Montana Submission Time: 1/3/2024 12:27:10 AM

Comment:

Taking away hunting opportunities from, but allowing others to take more of the same species makes no sense.

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



Name: Koepsell, James Community of Residence: CHARLOTTE NC Submission Time: 1/13/2024 1:21:19 AM Comment:

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 nonresident 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.

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

Proposal 3: Oppose



Name: Kraut, Kurt Community of Residence: Riverton, WY Submission Time: 1/10/2024 4:03:41 PM

Comment:

There is no legitimate benefit from allowing these policies to pass. Non- resident hunting for caribou in Alaska is beneficial for the conservation efforts of the species. The influx of non-resident hunters provides extensive stimulation to the economy 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
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



Name: Kropp, Reagan Community of Residence: Ripon, Wi Submission Time: 1/4/2024 2:18:32 AM

Comment:

There is no scientific argument to close caribou hunting to nonresident hunters. With such a low harvest rate for nonresidents, and them being bull only, they have no significant impact on population. Closing it is only for political reasons, and takes away an amazing opportunity and landscape for hunters to enjoy. The state f&g is also oppressed to said closure. This action defies the North American model for wildlife.

This is simply wrong.

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

Proposal 1: Support with Amendment Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Oppose Proposal 6: Support Proposal 7: Support Proposal 8: Support Proposal 10: Support Proposal 11: Oppose Proposal 12: Oppose Proposal 13: Support Proposal 14: Support Proposal 15: Support Proposal 16: Support Proposal 17: Support



Name: Kuchenbecker, Kurt Community of Residence: Blaine, WA Submission Time: 1/13/2024 7:42:41 AM

Comment:

Comment for proposal 3 and 38: I strongly oppose both proposals. These proposals are absolutely an attack on non-local hunters, nothing more. No change in population will result from these proposed restrictions and is only meant to protect a private hunting club made up of public land for the local population. The number of caribou non-locals harvest there is not even 2% of the total registered harvest in that area (not that most locals report their take or anything). Instead of making changes that are obviously meant punish a group, make a change that will actually make a difference like predator management and not harvesting cows and calves for a start.

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