



Submitted By
Scott Simmons
Submitted On
1/8/2017 9:08:26 AM
Affiliation

Proposal 159, opposed. The onus of proper animal identification falls solely with the hunter. There are multiple resources already available to aid anyone wishing to hone skills outside the field. ADFG has built in safeguard against sub 50" kills and that is counting brow tines. If unsure of dimensions and not required brow tines, don't shoot. Simple. I have this happen every year in 15c. I think it's a waste of resources to build a program that is redundant and will do little to alleviate the sub legal kill #s. One cannot replace common sense and experience with a few minute on line class.



Submitted By
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Submitted On
1/26/2017 7:43:31 AM
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Proposal #78; Yes. Alighning the Brown/Grizzly Bear season with the units sarounding unit 19C only makes good sence. I've seen hunters struggle to identify the line between 19C & 16B in the Mystic Pass area & enforcement trying to catch someone over the line. Alighning these seasons would solve all these problems.

Proposal #82; No. Drawing permits make things much more complicated for both the nonresidents and the guides & I'm not sure this issue needs such a drastic measure. My experiance in the Alaska Range with both residents and guides does'nt show me any big problems between the two, acually the guides I work with are very profesional with the residents I work with. However the residents do seem to have less success rate, I think for verious reasons. I'm not sure this propoal will help this.



IN REPLY REFER TO:
OSM 16112.PM

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

JAN 19 2017

Mr. Ted Spraker, Chairman
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

ATTN: Board of Game Comments

Dear Chairman Spraker:

The Alaska Board of Game (Board) is scheduled to meet February 17-25, 2017 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Interior and Northeast Arctic Regions. We have reviewed the 108 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federally qualified subsistence users and wildlife resources. Our comments are enclosed.

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

Sincerely,

Eugene R. Peltola Jr.,
Assistant Regional Director

Enclosure



Chairman Spraker

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cc: Anthony Christianson, Chair, Federal Subsistence Board
Stewart Cogswell, Acting Deputy Assistant Regional Director
Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Chief, Office of Subsistence Management
Kristy Tibbles, Executive Director, Board of Game, Board Support Section
Alaska Department of Fish and Game
Bruce Dale, Wildlife Division Director, Alaska Department of Fish and Game
Jill Klein, Special Assistant to the Commissioner, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Interior/Northeast Arctic Region

February 17-25, 2017

Fairbanks, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 46 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions. Reauthorize resident brown bear tag fee exemptions for the Interior/Northeast Arctic Region.

Current Federal Regulations:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted it will continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. Retaining this tag fee exemption is particularly important in areas where there are few vendors and local cash economies are in a depressed state.

PROPOSAL 47 – 5 AAC 92.990 (26). Definitions. Change the definition of “edible meat” for game birds as follows:

Current Federal Regulation:

§100.25(a) Definitions

Edible meat means the breast meat of ptarmigan and grouse, and those parts of caribou, deer, elk, mountain goat, moose, muskox, and Dall sheep that are typically used for human consumption, which are: The meat of the ribs, neck, brisket, front quarters as far as the distal (bottom) joint of the radius-ulna (knee), hind quarters as far as the distal joint (bottom) of the tibia-fibula (hock) and that portion of the animal between the front and hindquarters; however, edible meat of species listed in this definition does not include: Meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, and incidental meat reasonably lost as a



result of boning or close trimming of the bones, or viscera. For black bear, brown and grizzly bear, “edible meat” means the meat of front quarter and hindquarters and meat along the backbone (backstrap).

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board (Board). The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations, which may increase regulatory complexity, user confusion, and law enforcement concerns. There are no biological concerns for this proposal. It should be noted that the Federal Subsistence Board only regulates grouse and ptarmigan, while the subsistence harvest of migratory birds is managed by the U.S. Fish and Wildlife Service. The U.S. Fish and Wildlife Service recently changed their regulations regarding salvaging of meat in response to incidents of perceived waste of meat for some species. A companion proposal would need to be submitted to the Federal Subsistence Board to adopt this language into Federal Subsistence regulations for grouse and ptarmigan to gain consistency across State and Federal regulations.

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

Rationale for comment: This proposal would increase regulatory complexity and place additional burden on Federally qualified subsistence users.

PROPOSAL 68 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the “any bull” or “one bull” bag limits to “any antlered bull” for all moose hunts in the Interior/Northeast Arctic Region.

Current Federal Regulation:

Unit 12 – Moose

Unit 12—that portion within the Tetlin National Wildlife Refuge and those lands within the Wrangell-St. Elias National Preserve north and east of a line formed by the Pickerel Lake Winter Trail from the Canadian border to Pickerel Lake—1 antlered bull by Federal registration permit Aug. 24-Sept. 20.
Nov. 1-Feb. 28.

Unit 12—that portion east of the Nabesna River and Nabesna Glacier, and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border—1 antlered bull Aug. 24-Sept. 30.

Unit 12, remainder—1 antlered bull by joint Federal/State registration permit only Aug. 20-Sept. 20.



Unit 19 – Moose

Unit 19—Residents of Lime Village only—no individual harvest limit, but a village harvest quota of 28 bulls (including those taken under the State permits). Reporting will be by a community reporting system July 1-June 30.

Unit 19A—North of the Kuskokwim River, upstream from but excluding the George River drainage, and south of the Kuskokwim River upstream from and including the Downey Creek drainage, not including the Lime Village Management Area; Federal public lands are closed to the taking of moose No open season.

Unit 19A, remainder—1 antlered bull by Federal drawing permit or a State permit. Federal public lands are closed to the taking of moose except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under these regulations. The Refuge Manager of the Yukon Delta NWR, in cooperation with the BLM Field Office Manager, will annually establish the harvest quota and number of permits to be issued in coordination with the State Tier I hunt. If the allowable harvest level is reached before the regular season closing date, the Refuge Manager, in consultation with the BLM Field Office Manager, will announce an early closure of Federal public lands to all moose hunting Sept. 1-20.

Unit 19B—1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side Sept. 1-20.

Unit 19C—1 antlered bull Sept. 1-20.

Unit 19C—1 bull by State registration permit Jan. 15-Feb. 15.

Unit 19D—that portion of the Upper Kuskokwim Controlled Use Area within the North Fork drainage upstream from the confluence of the South Fork to the mouth of the Swift Fork—1 antlered bull Sept. 1-30.

Unit 19D—remainder of the Upper Kuskokwim Controlled Use Area—1 bull Sept. 1-30.
Dec. 1-Feb. 28.

Unit 19D, remainder—1 antlered bull Sept. 1-30.
Dec. 1-15.

Unit 20 – Moose



<i>Unit 20A—1 antlered bull</i>	<i>Sept. 1-20.</i>
<i>Unit 20B—that portion within the Minto Flats Management Area—1 bull by Federal registration permit only</i>	<i>Sept. 1-20. Jan. 10-Feb. 28.</i>
<i>Unit 20B, remainder—1 antlered bull</i>	<i>Sept. 1-20.</i>
<i>Unit 20C—that portion within Denali National Park and Preserve west of the Toklat River, excluding lands within Mount McKinley National Park as it existed prior to December 2, 1980—1 antlered bull; however, white-phased or partial albino (more than 50 percent white) moose may not be taken</i>	<i>Sept. 1-30. Nov. 15-Dec. 15</i>
<i>Unit 20C, remainder—1 antlered bull; however, white-phased or partial albino (more than 50 percent white) moose may not be taken</i>	<i>Sept. 1-30.</i>
<i>Unit 20E—that portion within Yukon-Charley Rivers National Preserve—1 bull</i>	<i>Aug. 20-Sept. 30.</i>
<i>Unit 20E—that portion drained by the Middle Fork of the Fortymile River upstream from and including the Joseph Creek drainage—1 bull</i>	<i>Aug. 20-Sept. 30.</i>
<i>Unit 20E, remainder—1 bull by joint Federal/State registration permit</i>	<i>Aug. 20-Sept. 30.</i>
<i>Unit 20F—that portion within the Dalton Highway Corridor Management Area—1 antlered bull by Federal registration permit only</i>	<i>Sept. 1-25.</i>
<i>Unit 20F, remainder—1 antlered bull</i>	<i>Sep. 1-30. Dec. 1-10.</i>

Unit 21 – Moose

<i>Unit 21B—that portion within the Nowitna National Wildlife Refuge downstream from and including the Little Mud River drainage—1 bull. A State registration permit is required from Sep. 5-25. A Federal registration permit is required from Sep. 26-Oct. 1</i>	<i>Sept. 5-Oct. 1</i>
<i>Unit 21B—that portion within the Nowitna National Wildlife Refuge downstream from and including the Little Mud River drainage—1 antlered bull. A Federal registration permit is required during the 5-day season and will be limited to one per household</i>	<i>Five-day season to be announced between Dec. 1 and Mar. 31.</i>
<i>Unit 21A and 21B, remainder—1 bull</i>	<i>Aug. 20-Sept. 25.</i>



Unit 21C—1 antlered bull

Nov. 1-30.
Sept. 5-25.

Unit 21D—Koyukuk Controlled Use Area—1 bull; 1 antlerless moose by Federal permit if authorized by announcement by the Koyukuk/Nowitna NWR manager. Harvest of cow moose accompanied by calves is prohibited. A harvestable surplus of cows will be determined for a quota

Sept. 1-25.
Mar. 1-5 season to be announced.

or

1 antlered bull by Federal permit, if there is no Mar. 1-5 season and if authorized by announcement by the Koyukuk/Nowitna NWR manager and BLM Central Yukon field office manager. A harvestable surplus of bulls will be determined for a quota. Announcement for the March and April seasons and harvest quotas will be made after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and Middle Yukon and Koyukuk River Fish and Game Advisory Committee

Apr. 10-15 season to be announced.

Unit 21D, remainder—1 moose; however, antlerless moose may be taken only during Sep. 21-25 and the Mar. 1-5 season if authorized jointly by the Koyukuk/Nowitna National Wildlife Refuge Manager and the Central Yukon Field Office Manager, Bureau of Land Management. Harvest of cow moose accompanied by calves is prohibited. During the Aug. 22-31 and Sep. 5-25 seasons, a State registration permit is required. During the Mar. 1-5 season a Federal registration permit is required. Announcement for the antlerless moose seasons and cow quotas will be made after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee

Aug. 22-31.
Sept. 5-25.
Mar. 1-5 season to be announced.

Unit 21E—1 moose; however, only bulls may be taken from Aug. 25-Sep. 30

Aug. 25-Sept. 30.
Feb. 15-Mar. 15.

During the Feb. 15-Mar. 15 season, a Federal registration permit is required. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee as stipulated in a letter of delegation. Moose may not be taken within one-half mile of the Innoko or Yukon River during the winter season

Unit 24 – Moose

Unit 24A—1 antlered bull by Federal registration permit

Aug. 25-Oct. 1.



Unit 24B—that portion within the John River Drainage—1 moose Aug. 1-Dec. 31.

Unit 24B, remainder—1 antlered bull by Federal registration permit Aug. 25-Oct. 1.
Dec. 15-Apr. 15.

Federal public lands in the Kanuti Controlled Use Area, as described in Federal regulations, are closed to taking of moose, except by Federally qualified subsistence users of Unit 24, Koyukuk, and Galena hunting under these regulations

Units 24C and 24D—that portion within the Koyukuk Controlled Use Area and Koyukuk National Wildlife Refuge—1 bull Sept. 1-25.

1 antlerless moose by Federal permit if authorized by announcement by the Koyukuk/Nowitna National Wildlife Refuge Manager and BLM Field Office Manager Central Yukon Field Office. Harvest of cow moose accompanied by calves is prohibited. A harvestable surplus of cows will be determined for a quota

or

1 antlered bull by Federal permit, if there is no Mar. 1-5 season and if authorized by announcement by the Koyukuk/Nowitna National Wildlife Refuge Manager and BLM Field Office Manager Central Yukon Field Office. Harvest of cow moose accompanied by calves is prohibited. Announcement for the March and April seasons and harvest quotas will be made after consultation with the ADF&G Area Biologist and the Chairs of the Western Interior Alaska Subsistence Regional Advisory Council, and the Middle Yukon and Koyukuk River Fish and Game Advisory Committees

Mar. 1-5 to be announced.

or

Apr. 10-15 to be announced.

Unit 24C, remainder and Unit 24D, remainder—1 antlered bull. During the Sep. 5-25 season, a State registration permit is required Aug. 25-Oct. 1

Unit 25 – Moose

Unit 25A—1 antlered bull Aug. 25-Sept. 25.
Dec. 1-10.

Unit 25B—that portion within Yukon-Charley National Preserve—1 bull Aug. 20-Sept. 30.

Unit 25B—that portion within the Porcupine River drainage upstream from, but excluding the Coleen River drainage—1 antlered bull Aug. 25-Sept. 30.
Dec. 1-10.

Unit 25B—that portion, other than Yukon-Charley Rivers National Preserve, Sept. 5-30.



draining into the north bank of the Yukon River upstream from and including the Kandik River drainage, including the islands in the Yukon River—1 antlered bull Dec. 1-15.

Unit 25B, remainder—1 antlered bull Aug. 25-Sept. 25.
Dec. 1-15.

Unit 25C—1 antlered bull Aug. 20-Sept. 30.

Unit 25D (west)—that portion lying west of a line extending from the Unit 25D boundary on Preacher Creek, then downstream along Preacher Creek, Birch Creek, and Lower Mouth of Birch Creek to the Yukon River, then downstream along the north bank of the Yukon River (including islands) to the confluence of the Hadweenzic River, then upstream along the west bank of the Hadweenzic River to the confluence of Forty and One-Half Mile Creek, then upstream along Forty and One-Half Mile Creek to Nelson Mountain on the Unit 25D boundary—1 bull by a Federal registration permit. Permits will be available in the following villages: Beaver (25 permits), Birch Creek (10 permits), and Stevens Village (25 permits). Permits for residents of 25D (west) who do not live in one of the three villages will be available by contacting the Yukon Flats National Wildlife Refuge Office in Fairbanks or a local Refuge Information Technician. Moose hunting on public land in Unit 25D (west) is closed at all times except for residents of Unit 25D (west) hunting under these regulations. The moose season will be closed by announcement of the Refuge Manager Yukon Flats NWR when 60 moose have been harvested in the entirety (from Federal and non-Federal lands) of Unit 25D (west) Aug. 25-Feb. 28.

Unit 25D, remainder—1 antlered moose Aug. 25-Oct. 1.
Dec. 1-20.

Units 26B and 26C – Moose

Unit 26B—excluding the Canning River drainage—1 bull Sept. 1-14.

Units 26B, remainder and 26C—1 moose by Federal registration permit by residents of Kaktovik only. Federal public lands are closed to the taking of moose except by a Kaktovik resident holding a Federal registration permit and hunting under these regulations May be announced.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife



proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: While many units across the Interior region have fall moose hunts that could be clarified as “any antlered bull” (i.e. most of Unit 20 and Unit 21), several units have winter hunts that would essentially be nullified (i.e. February hunts in Units 19C and 25D) by adoption of this proposal. There are no conservation concerns associated with this proposal. Although this proposal aims to prevent harvest of calves, mortality is usually highest during the first year of life and therefore, much of this mortality is likely to be compensatory in nature. Changing to “any antlered bull” may prevent accidental harvest of cows but the degree to which this has occurred in the past would have to be examined on a unit by unit basis to determine whether such a restriction is warranted.

This proposal would decrease opportunity for Federally qualified subsistence users in those units with winter hunts.

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

Rationale: Although “any antlered bull” regulations may be biologically justified in some cases, there do not appear to be any biological concerns for moose in the Units covered by this proposal. In addition, this proposal would result in decreased hunting opportunity for Federally qualified subsistence users during winter hunts.

PROPOSAL 76 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Lengthen the hunting season for moose in Unit 21E.

Current Federal Regulation:

Unit 21E – Moose

*Unit 21E—1 moose; however, only bulls may be taken from Aug. 25-Sep. 30 Aug. 25-Sept. 30.
Feb. 15-Mar. 15.*

During the Feb. 15-Mar. 15 season, a Federal registration permit is required. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee as stipulated in a letter of delegation. Moose may not be taken within one-half mile of the Innoko or Yukon River during the winter season

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.



Impact to Federal Subsistence users/wildlife: This proposal would increase hunting opportunity for Federally qualified subsistence users by allowing them to hunt on both State and Federal administered lands from Sept. 1-5. It would also eliminate the burden of determining land status during this time period, which is difficult due to the checkerboard land ownership pattern in Unit 21E.

There are no conservation concerns for this proposal as the bull:cow ratio in this unit is high and harvest has historically been well below management objectives.

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

Rationale: This proposal will increase hunting opportunity for Federally qualified subsistence users and is not expected to result in any conservation concerns.

PROPOSAL 84 – 5 AAC 84.270. Furbearer trapping. Lengthen the trapping season for wolf in Units 12 and 20E.

Current Federal Regulation:

Unit 12 – Trapping – Wolf

No Limit

Oct. 1-Apr. 30

Unit 20 – Trapping – Wolf

Unit 20E–No limit

Oct. 1-Apr. 30

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would align State and Federal regulations, which would decrease regulatory complexity, user confusion, and law enforcement concerns. This proposal would decrease regulatory complexity for Federally qualified subsistence users who also trap under State regulations.

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

Rationale for comment: This proposal would decrease regulatory complexity by aligning State and Federal regulations.

PROPOSAL 85 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a resident drawing hunt for caribou in Unit 20E.



Current Federal Regulation:

Unit 20E – Caribou

*Unit 20E—1 caribou; A joint State/Federal registration permit is required. Aug. 10-Sept. 30.
During the Aug. 10-Sep. 30 season, the harvest is restricted to 1 bull. The Nov. 1-Mar. 31.
harvest quota for the period Aug. 10-29 in Units 20E, 20F, and 25C is 100
caribou. During the Nov. 1-Mar. 31 season, area closures or hunt
restrictions may be announced when Nelchina caribou are present in a mix
of more than 1 Nelchina caribou to 15 Fortymile caribou, except when the
number of caribou present is low enough that fewer than 50 Nelchina
caribou will be harvested regardless of the mixing ratio for the two herds*

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: This proposal would allow the take of any caribou during September and would move the start date of the winter season to Oct. 21. It is unclear whether residents would be able to obtain both a drawing and registration permit in order to harvest two caribou or whether the intent is simply to allow harvest of cows in September and to extend the winter season. However, as State seasons are generally closed early due to quotas being met, it seems unlikely that harvest of additional caribou would occur.

This proposal targets the Nelchina caribou herd (NCH), which currently exceeds management objectives. While 60-95% of the NCH winters in southern Unit 20E, Nelchina caribou generally spend the rut in Unit 13. Overgrazing of winter range in southern Unit 20E is increasingly becoming a conservation concern.

This proposal would have minimal effects on Federally qualified subsistence users. Federally qualified subsistence users could apply for drawing permits, which could increase their opportunity. However, the drawing permit may attract additional users to the area, increasing competition, particularly in November when there is currently an open Federal season but not a State season.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: As the NCH exceeds management objectives and may be causing range degradation, OSM supports increasing harvest of this herd. However, Nelchina caribou are not usually present in southern Unit 20E during September. Additionally, as State quotas are generally met, expanding seasons and harvest limits may not be warranted.

PROPOSAL 91 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Modify the hunting season and bag limits for grouse in Unit 12.



Current Federal Regulation:

Unit 12 – Grouse (Spruce, Ruffed, and Sharp-tailed)

15 per day, 30 in possession

Aug. 10-Mar. 31.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: This proposal would decrease opportunity for Federally qualified subsistence users and would increase regulatory complexity by misaligning State and Federal regulations.

Harvest of grouse may decrease if this proposal is approved. However, while data on grouse populations and harvest in Unit 12 is limited, the 2016 small game survey indicated that grouse populations across Interior Alaska are stable or increasing.

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

Rationale: This proposal decreases opportunity and increases regulatory complexity. There does not seem to be a conservation concern for grouse in this area.

PROPOSAL 94 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Modify the hunting season for moose in Unit 21D.

Current Federal Regulation:

Unit 21D – Moose

Unit 21D, remainder—1 moose; however, antlerless moose may be taken only during Sep. 21-25 and the Mar. 1-5 season if authorized jointly by the Koyukuk/Nowitna National Wildlife Refuge Manager and the Central Yukon Field Office Manager, Bureau of Land Management. Harvest of cow moose accompanied by calves is prohibited. During the Aug. 22-31 and Sep. 5-25 seasons, a State registration permit is required. During the Mar. 1-5 season a Federal registration permit is required. Announcement for the antlerless moose seasons and cow quotas will be made after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee

*Aug. 22-31.
Sept. 5-25.
Mar. 1-5 season
to be announced.*

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to



change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: This proposal would increase regulatory complexity by misaligning State and Federal moose seasons in Unit 21D. The issuance of a Federal permit may also be required during the August season, increasing the regulatory burden on Federally qualified subsistence users.

This proposal would increase harvest opportunity for Federally qualified subsistence users by enabling them to hunt Sept. 1-5 and Sept. 26-30 under State regulations and Aug. 22-31 under Federal regulations. However, Federally qualified subsistence users would be limited to Federal public lands during August, which are difficult to distinguish given the checkerboard land ownership in Unit 21D remainder.

This proposal would likely increase moose harvest as >50% of harvest in Unit 21D generally occurs between 9/15 and 9/25. Additionally, as the end of September approaches the peak of the rut, bull moose are much more responsive to calling, making them more susceptible to harvest. Hunters returning from hunting in the Koyukuk CUA (season closes Sept. 25) may also utilize the extended season in Unit 21D remainder, further increasing moose harvest in this hunt area.

The moose population around the confluence of the Koyukuk and Yukon rivers has a low bull:cow ratio. Given the State season is bulls-only, an increase in bull harvest in this area would further depress the bull:cow ratio. The moose population in the Kaiyuh Slough area is at low density and very susceptible to increases in harvest. Harvest during the rut may disrupt breeding, which could impede growth of the moose population.

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

Rationale: The moose population in Unit 21D remainder cannot withstand an increase in harvest. Additionally, this proposal increases regulatory complexity for Federally qualified subsistence users.

PROPOSAL 103 – 5 AAC 92.010. Harvest tickets and reports; and 85.025. Hunting seasons and bag limits for caribou. Modify the hunt structure of the Western Arctic and Teshekpuk caribou herds.

Current Federal Regulation:

Unit 21D remainder – Caribou

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

Bulls may be harvested

July 1-Oct. 14.

Feb. 1-June 30.

Cows may be harvested

Sept. 1-Mar. 31.



Unit 23 – Caribou

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

Calves may not be taken

Bulls may be harvested

July 1-Oct. 14.

Feb. 1-June 30.

Cows may be harvested. However, cows accompanied by calves may not be taken July 15-Oct. 14

July 15-Apr. 30.

Unit 23, remainder—5 caribou per day, as follows: Calves may not be taken

Bulls may be harvested

July 1-Oct. 31.

Feb. 1-June 30.

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

July 31-Mar. 31.

Unit 24 – Caribou

Units 24A remainder, 24B remainder—5 caribou per day as follows: Calves may not be taken.

Bulls may be harvested

July 1-Oct. 14.

Feb. 1-June 30.

Cows may be harvested.

July 15-Apr. 30.

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

Bulls may be harvested

July 1-Oct. 14.

Feb. 1-June 30.

Cows may be harvested.

Sept. 1-Mar. 31.

Unit 26A – Caribou

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

Bulls may be harvested

July 1-Oct. 14.

Dec. 6-June 30.



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

*Unit 26A remainder—5 caribou per day as follows: Calves may not be taken
Bulls may be harvested* July 1-Oct. 15.
Dec. 6-June 30.

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

Unit 26B – Caribou

*Unit 26B, that portion south of 69°30' N. lat. and west of the Dalton Highway—5 caribou per day as follows:
Bulls may be harvested* July 1-Oct. 14.
Dec. 10-June 30.

Cows may be harvested July 1-Apr. 30.

*Unit 26B remainder—5 caribou per day as follows:
Bulls may be harvested* July 1-June 30.

Cows may be harvested July 1-May 15.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: This proposal would increase the regulatory burden on Federally qualified subsistence users by requiring them to obtain a registration permit. However, the data provided by this proposal would be extremely useful in tracking harvest of the WACH and TCH, including determining if overharvest is occurring by herd and/or by sex (i.e. > 2% of cows in harvest). Currently, harvest is extrapolated from community harvest surveys and it is difficult to determine what role human harvest may be having on the current status of both herds. This proposal would also allow for increased management flexibility and quicker responses to changing conditions.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: This proposal would aid in the conservation of the WACH and TCH, vital subsistence resources. Last year, the State changed regulations to reduce harvest limits for nonresidents in response to the decline of the WAC and TCH as well as sweeping changes across the range of both herds for



residents. However, due to the large amount of Federal public lands over much of the range of both herds, in order for this proposal to be truly effective, a similar proposal would need to be approved by the Federal Subsistence Board.

PROPOSAL 104 - 5 AAC 85.025(15). Hunting seasons and bag limits for caribou. Expand the bag limits for caribou in Units 24A, 25A, 25D, 26B and 26C.

Current Federal Regulations

Unit 24—Caribou

Unit 24A—that portion south of the south bank of the Kanuti River—1 caribou Aug. 10 - Mar. 31

Unit 24B—that portion south of the south bank of the Kanuti River, upstream from and including that portion of the Kanuti-Kilolitna River drainage, bounded by the southeast bank of the Kodosin-Nolitna Creek, then downstream along the east bank of the Kanuti-Kilolitna River to its confluence with the Kanuti River—1 caribou. Aug. 10 – Mar. 31.

Unit 24A remainder, 24B remainder—5 caribou per day as follows:

Calves may not be taken

*Bulls may be harvested July 1 - Oct. 14
Feb. 1 - June 30*

Cows may be harvested July 15 - Apr. 30

Units 24C, 24D—5 caribou per day as follows:

Calves may not be taken

*Bulls may be harvested July 1 - Oct. 14
Feb. 1 - June 30*

Cows may be harvested Sept. 1- Mar. 31

Unit 25—Caribou

Unit 25A— in those portions west of the east bank of the East Fork of July 1 - June 30.



the Chandalar River extending from its confluence with the Chandalar River upstream to Guilbeau Pass and north of the south bank of the mainstem of the Chandalar River at its confluence with the East Fork Chandalar River west (and north of the south bank) along the West Fork Chandalar River—10 caribou. However, only bulls may be taken May 16 – June 30.

Unit 25C— *1 caribou; a joint State/Federal registration permit is required. During the Aug. 10 – Sept. 30 season the harvest is restricted to 1 bull. The harvest quota between Aug.10 - 29 in Units 20E, 20F, and 25C is 100 caribou.*

*Aug. 10 - Sept. 30
Nov. 1 – Mar. 31*

Unit 25D—*that portion drained by the west fork of the Dall River west of 150°W. Long.—1 bull*

*Aug. 10-Sept. 30
Dec. 1 – Dec. 31*

Units 25A remainder, 25B, and 25D remainder—*10 caribou*

July 1 – Apr. 30

Unit 26—Caribou

Unit 26A, *that portion of the Colville River drainage upstream from the Anaktuvuk River, and drainages of the Chukchi Sea south and west of, and including the Utukok River drainage—~~10~~ 5 caribou per day as follows:*

However, calves may not be taken

Bulls may be harvested

*July 1 - Oct. 14
Dec. 6 - June 30*

Cows may be harvested

However, cows accompanied by calves may not be taken July 15-Oct. 15.

July 15 - Apr. 30.

Unit 26A remainder—*Up to 5 caribou per day.*

However, calves may not be taken

Bulls may be harvested

*July 1 - Oct. 15
Dec. 6 - June 30*

July 16 - Mar. 15

Up to 3 cows per day may be harvested

However, cows accompanied by calves may not be taken July 16-Oct. 15



Unit 26B, that portion south of 69° 30' N. lat. and west of the Dalton Highway—5 caribou per day as follows:

Bulls may be harvested July 1 -Oct. 14
Dec. 10–June 30

Cows may be harvested July 1-Apr. 30

Unit 26B remainder—5 caribou per day as follows:

Bulls may be harvested July 1 - June 30

Cows may be harvested July 1- May 15

Unit 26C—10 caribou per day July 1 – Apr. 30

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: The proposed changes were recommended to align the Central Arctic Herd (CAH) seasons and bag limits within the herd’s range. In some cases the changes proposed by ADF&G result in additional hunting opportunities and other cases reduce the hunting opportunities for Federally qualified subsistence users. Most of the recommended changes allow for more harvest from the CAH and the Porcupine Caribou Herd (PCH), two populations which are currently doing well. There are also a few changes which provide additional protection for cow caribou.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale for comment: The proposed changes are appropriate given what is known about the seasonal movements and distribution of the CAH and PCH. If this proposal is adopted, Federal and State regulations would be misaligned and create confusion for hunters if similar changes were not made to Federal subsistence regulations. A great deal of effort was made to align the current Federal (2016-2018) and State (2016-2017) caribou regulations as much as possible. Additional time to evaluate the effects on caribou harvest from the current Federal and State regulations would be useful before making additional changes.

PROPOSAL 109 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Lengthen the brown bear hunting seasons in Units 25 and 26.



Current Federal Regulation:

Unit 25 – Brown Bear

Units 25A and 25B—1 bear Aug. 10-June 30.

Unit 25D—2 bears every regulatory year July 1-June 30.

Unit 26B and 26C – Brown Bear

Unit 26B—1 bear Jan. 1-Dec. 31.

Unit 26C—1 bear Aug. 10-June 30.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: Changing the opening date of the State brown bear season to Aug. 1 in Units 25A, 25B, and 26C would increase regulatory complexity by misaligning State and Federal seasons. However, the requested change would provide 10 additional days of hunting opportunity in these subunits.

In Unit 25D, the State resident season is currently open Mar. 1-Nov. 30. Changing the Unit 25D season to Aug. 1-June 30 would eliminate the July season, decreasing opportunity. While the requested change would allow harvest from Dec. 1-Feb. 28 in Unit 25D, more bears are expected to be harvested in the summer than during winter hibernation. Additionally, the brown bear population in Unit 25D may be increasing while moose density remains low. Increasing bear harvest to reduce moose predation is a strategy identified in the Yukon Flats Cooperative Moose Management Plan.

Between 2003 and 2013, reported brown bear harvest in Unit 25A was undersubscribed (48 bears is the allowable harvest while reported harvest ranged from 21-31 bears). During the same time period, reported harvest in Units 25B and 25D was vastly undersubscribed (47 bears is the allowable harvest while reported harvest ranged from 1-6 bears). During the same time period, reported harvest in Unit 26C was undersubscribed in all years, except 2013 when harvest equaled allowable harvest (31 bears is the allowable harvest while reported harvest ranged from 6-31 bears). In Unit 26B, brown bear harvest has been close to or exceeded the allowable harvestable limit of 21 bears since 2008 (range 18-28 bears between 2008 and 2013).

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

Rationale: The differing harvest levels in these units demonstrate that aligning regulations may not be appropriate. While harvest in Units 25D and 25B could be increased substantially, harvest in Units 26B and 26C should not. Additionally, this proposal would eliminate the July season in Unit 25D, decreasing



opportunity and potentially bear harvest in a unit where harvest is already low. This proposal also misaligns several State and Federal seasons, increasing regulatory complexity.

PROPOSAL 110 – 5 AAC 85.015. Hunting seasons and bag limits for black bear. Increase the bag limit for black bear in Unit 25B.

Current Federal Regulation:

Unit 25 – Black Bear

Unit 25B–3 bears

July 1-June 30

Or 3 bears by State community harvest permit

July 1-June 30

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: There are currently no black bear density estimates available for Unit 25B. Federally qualified subsistence users are currently limited to 3 black bears per year and have the option of participating in a community harvest program. Local users have yet to fully utilize community harvest permits for this species. Black bears are not required to be sealed in Units 25D and 25B, so it is uncertain how many black bears are currently being taken in this area. Increasing the black bear limit to 5 bears would provide more opportunity to Federally qualified subsistence users. Adoption of this proposal would result in misalignment of State and Federal regulations, which will increase regulatory complexity, user confusion, and law enforcement concerns.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale for comment: Although increasing the limit to 5 black bears in Unit 25B would provide increased opportunity to Federally qualified subsistence users, there are currently no data pertaining to black bear density and population levels in this Unit. Population uncertainties associated with this proposal should be considered before it is adopted.

PROPOSAL 114 – 5 AAC 85.057. Hunting seasons and bag limits for wolverine. Lengthen the hunting season for wolverine in Unit 26:

Current Federal Regulation:

Unit 26—Wolverine

5 wolverines

Sept. 1–Mar.31

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife



proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users would be provided more opportunity to harvest wolverine under the proposed hunting regulations. Although the proponent mentioned a change in bag limits for wolverine, no specific recommendation was made.

Wolverines, which occur at low densities throughout Alaska have large home ranges ranging from 39 mi² to 386 mi². The breeding season extends from May through August. Following implantation which generally occurs from November through March, and a gestation period of 30-40 days, 1-2 young are born between February and April. The kits remain with female for 12-14 weeks. Therefore, kits born in late April would be just leaving the den in late July. Adoption of this proposal would extend the harvest into the denning period. While females likely only leave the dens for short periods of time to access food, the risk of litter loss would increase.

Although there is likely considerable underreporting, the reported wolverine harvests from 2009-2012 indicate that the hunting and trapping harvest is sustainable for Unit 26.

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

Rationale: The proposed change to extend the hunting season to mid-July would overlap with wolverine breeding and the denning period and could therefore adversely impact the population. This proposed change would also result in misalignment of Federal and State wolverine hunting seasons for Unit 26. Maintaining the current harvest season from Sept. 1 – Mar.31 is recommended.

PROPOSAL 115 – 5 AAC 84.270. Furbearer trapping. Lengthen the trapping season for lynx in Unit 25.

Current Federal Regulation:

Trapping

Unit 25 — Lynx

Lynx—No limit.

Nov. 1 – Mar. 31

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: This proposal would reduce regulatory complexity by aligning State and Federal lynx seasons. It would also align State and Federal wolverine trapping seasons in Units 25A, 25B, and 25D with State and Federal lynx trapping seasons in these subunits. Therefore,



incidental take of lynx in March in Units 25A, 25B and 25D when targeting wolverine would be legal. As lynx are primarily regulated by prey abundance, not harvest, no negative consequences to the lynx population are anticipated.

One concern is the incidental harvest of wolverine in Unit 25C, resulting from the extended lynx season. The State wolverine trapping season in Unit 25C has historically been a month shorter than the wolverine trapping season in the remainder of Unit 25 due to this subunit’s road accessibility and proximity to Fairbanks, which results in greater trapping pressure. As the lynx season is already 15 days longer than the wolverine trapping season in Unit 25C, incidental take may already be occurring. However, as incidental take is rarely reported, it is difficult to determine how much of a conservation concern this is.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: OSM supports extending the lynx trapping season in Units 25A, 25B, and 25D to reduce regulatory complexity, legalize incidental take of lynx in March, and because there are no conservation concerns. However, there is concern associated with extending the lynx trapping season in Unit 25C due to possible conservation concerns for wolverines in this subunit.

PROPOSAL 143 – 5 AAC 85.045(1). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting seasons in Unit 1C.

Current Federal Regulations:

Unit 1C – Moose

Unit 1C – that portion south of Point Hobart including all Port Houghton drainages – 1 bull with spike-fork or 50 –inch antlers or 3 or more brow tines on one side, or antlers with 2 brow tines on both sides, by State registration permit only Sept. 15 – Oct. 15

Unit 1C, remainder, excluding drainages of Berners Bay – 1 bull by State registration permit only Sept. 15 – Oct. 15

Unit 1C, Berners Bay No open season

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal Subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users.

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



Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest moose in this unit and provide management flexibility.

PROPOSAL 144 – 5 AAC 85.045(3). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in Unit 5A, the Nunatak Bench hunt.

Current Federal Regulations:

Unit 5 – Moose

*Unit 5A – Nunatak Bench – 1 moose by State registration permit only. Nov. 15 – Feb. 15
The season will be closed when 5 moose have been taken from the
Nunatak Bench*

See comments for proposal #143.

PROPOSAL 145 – 5 AAC 085.045(4). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in Unit 6C.

Current Federal Regulations:

Unit 6 – Moose

*Unit 6C—1 antlerless moose by Federal drawing permit only Sept. 1 – Oct. 31
Permits for the portion of the antlerless moose quota not
harvested in the Sep. 1-Oct. 31 hunt may be available for
redistribution for a Nov. 1-Dec. 31 hunt*

*Unit 6C—1 bull by Federal drawing permit only Sept. 1 – Dec. 31
In Unit 6C, only one moose permit may be issued per household.
A household receiving a State permit for Unit 6C moose may not
receive a Federal permit. The annual harvest quota will be
announced by the U.S. Forest Service, Cordova Office, in
consultation with ADF&G. The Federal harvest allocation will
be 100% of the antlerless moose permits and 75% of the bull
permits. Federal public lands are closed to the harvest of moose
except by Federally qualified users with a Federal permit for
Unit 6C moose, Nov. 1-Dec. 31*



Unit 6, remainder

No open season

See comments for proposal #143.

PROPOSAL 146 - 5 AAC 85.045(5). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the Twentymile/Portage/Placer hunt areas in Units 7 and 14C.

Current Federal Regulations:

Unit 7—Moose

Unit 7 – that portion draining into Kings Bay

No open season

Federal Public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek.

Unit 7 remainder

1 antlered bull with spike-fork or 50–inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only.

Aug. 10 – Sept. 20

Unit 14—Moose

No Federal open season

See comments for proposal #143.

PROPOSAL 147 - 5 AAC 85.045(11). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in Unit 13.

Current Federal Regulations:

Unit 13 – Moose

Unit 13E – 1 antlered bull moose by Federal registration permit only; only 1 permit will be issued per household

Aug. 1 – Sept. 20

Unit 13 remainder – 2 bulls by Federal registration permit only

Aug. 1 – Sept. 30



See comments for Proposal 143.

PROPOSAL 148 - 5 AAC 85.045(13). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season on Kalgin Island in Unit 15B.

Current Federal Regulations:

Unit 15A remainder, 15B, 15C—Moose

Unit 15A—Skilak Loop Wildlife Management Area *No open season*

Unit 15A—remainder, 15B, and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. *Aug. 10–Sept. 20*

Units 15B and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai NWR Refuge Manager is authorized to close the October/November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council. *Oct. 20–Nov. 10*

Unit 15C—1 cow by Federal registration permit only *Aug. 10 – Sept. 20*

See comments for Proposal 143.

PROPOSAL 149 - 5 AAC 85.045(13). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season and targeted moose season in a portion of Unit 15C.

Current Federal Regulations:

Unit 15A remainder, 15B, 15C—Moose

Unit 15A—Skilak Loop Wildlife Management Area *No open season*

Unit 15A—remainder, 15B, and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. *Aug. 10–Sept. 20*



Units 15B and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai NWR Refuge Manager is authorized to close the October/November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council. Oct. 20–Nov. 10

Unit 15C—1 cow by Federal registration permit only Aug. 10 – Sept. 20

See comments for Proposal 143.

PROPOSAL 150 - 5 AAC 85.045(15). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in Unit 17A.

Current Federal Regulation:

Unit 17A – Moose

Unit 17A—1 bull by State registration permit Aug. 25-Sept. 20.

Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit Up to a 31-day season may be announced between Dec. 1- last day of Feb.

See comments for Proposal 143.

PROPOSAL 153 - 5 AAC 92.015. Brown bear tag fee exemption. Reauthorize resident brown bear tag fee exemptions in the Central/Southwest Region.

Current Federal Regulation:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.



Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2017.

Impact to Federal subsistence users/wildlife: There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted it would continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users must purchase a \$25 tag before hunting brown bears in these units. Retaining this tag fee exemption is particularly important in areas where there are few vendors and local economies are in a depressed state.



To: Alaska Board of Game
From: Brian West
1000 Oceanview Drive
Anchorage, Alaska 99515

Alaska Board of Game
2016/2017 Proposed Changes to Regulations
Arctic/Western Alaska
Interior/Northeast Arctic Region



Comments to Interior/Northeast Arctic Region

Proposal 49. Support. The new regulation identified specifically punishes residents. The Board has shown by passing that regulation that they are more interested in being a revenue generator for guides, many of whom are not residents, than they are in protecting the right of Alaskans as granted in our constitution. This regulation requires a resident who hunts with a non-resident family member to go on two separate hunts, one with and one without the family member, if he wants to take an animal. Who can afford that? This proposal should be adopted.

Proposal 50. Support. See comments to proposal 49.

Proposal 51. Support. Where moose and caribou populations are under stress no non-resident hunting should be allowed. Herds are to be managed for the benefit of Alaskans.

Proposal 52. Support, with changes. The cap proposed is too high, no permits should be given to non-residents. Any hunt requiring a permit means that the populations in question cannot support a general hunt. As such, since game is to be managed for Alaskans, non-residents should be given no permits. If Alaskans are being denied permits how can permits go to non-residents? Only if all Alaskans who apply for the permit receive one and there are still permits available should any go to non-residents.

Proposal 53-56. Against. These proposals could have the effect of shutting out Alaskans who do not live in a specific area.

Proposal 57. Support if amended. The cap should be zero. See comments to proposal 52.

Proposal 58. Support if amended. Again the cap should be zero. This should be simple. If permits are required only if Alaskans do not apply for a permit should any go to non-residents. Alaskan hunters must always be given priority. If guides are afraid of not making as much money they should be finding ways to make their services desirable to Alaskans instead of relying on the Board to funnel clients their way.

Proposal 60. Against. No permits for non-residents. If there is a general season then there is no need to cap non-residents.

Proposal 62. Against. See comments to proposal 60.

Proposal 64. Support if amended. The time frame should be increased to ten years and loss of trophy should be included. The penalty should be harsh enough to eliminate the so called honest mistakes.



Proposal 66. Against. There is no prohibition to using a bow during the general season. No special season is required.

Proposal 68. Support.. The majority of moose hunts in Alaska have some type of antler restriction and in these hunts taking a calf in the first year of life is unlawful. This proposal basically makes taking of calves unlawful, which is a reasonable restriction.

Proposal 69. Against. There is no reason for lengthening the season. I am against all special hunts and special seasons. At some point in the future to hunt you will need to be covered by a special season, or weapon, or hunt. It is insane. Hunting is not a sport, it is a means to feed ones family. If people do not want to hunt during the general season then they should not be given special seasons.

Proposal 70. Against. Current law does not prohibit these individuals from hunting. A special season or hunt is unjustified.

Proposal 71. Against. Physical ability or lack there of is not a justification for providing exemptions to the hunting regulations. If, as the proposer states, a person lacks the physical ability to stalk and shoot an animal, how can it be conceived that that individual can properly care the the meat while in the field? This is merely a blatant attempt by a select group to gain an advantage over all others.

Proposal 72. Against.

Proposal 76. Support. This seems reasonable especially if the federal season also changes.

Proposal 77. Support. I agree with the statements made in the proposal.

Proposal 78. Support. This would also align the bear season with the caribou season in unit 19C, so early caribou hunters would be able to take a bear.

Proposal 79. Support. This would increase the take of bear helping the moose and caribou populations.

Proposal 81. Support. This is a logical request.

Proposal 82. Support with amendment. I would support if the number of permits was capped at the lowest number from the time period given. Also the start of the season should be moved to September 1 to give resident hunters first opportunity to hunt.

Proposal 83. Against. When a general hunt can not be supported no permits should be given to non-residents.

Proposal 85. Against. There is already a registration caribou hunt in this area.

Proposal 86. Support. This is a reasonable request and has precedence in the state. I believe that no hunting is allowed within ¼ mile of the Denali Highway near Cantwell, presumably fort he safety of the nearby residents.

Proposal 87. Support. Adoption of this proposal will only help the resource.



Proposal 90. Against. Reasons given are not supportive of increasing the size of the CSH area.

Proposal 97. Support. I agree with the discussion provided by the proposer.

Proposal 101. Against. There is no indication of the number of events or the number of moose to be taken for such events. Adoption of this proposal without an indication of the number of moose to be taken or the type of event that would qualify for a permit would basically be giving a permit to take moose whenever the mood struck. This would be detrimental to the health of the moose population.

Proposal 105. Support. I agree with the points raised in the proposal.

Proposal 109. Support with amendments. Unit 25C should also be included. Current regulations indicate abundant game in this unit. Moving the bear season up would allow for more bear hunting opportunities, especially in Unit 25C as it would open before the caribou season.

Proposal 113. Support. I agree with the points raised in the proposal.

Proposal 117, 118, 119, 120, 121, Support.

Proposal 126. Against. No viable reason given for the date change.

Proposal 128 and 129. Support if amended. If amended to any antlered moose I would support. It appears the population can sustain such a hunt especially since the Fish and Game is proposing an antlerless hunt in this unit (Proposal 125).

Proposal 132. Against. Moving the non-resident season to coincide with the resident season puts the two in conflict. Residents should have priority.

Proposal 141. Support. This is a reasonable request.

*Brian West
1000 Oceanview dr
Anch AK 99515*



Submitted By Andrew Willis
Submitted On
1/29/2017 10:37:14 AM
Affiliation

Proposal 78

Yes

I support as the other units around 19C are open for brown bear aug 10

Submitted By
Andy Willis
Submitted On
1/29/2017 10:53:27 AM
Affiliation

Proposal 82

No

I have hunted 19C for many years and have not had any nonresident hunter conflicts



Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

November 1, 2016

Ted Spraker, Chair
Alaska Board of Game
c/o ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526
dfg.bog.comments@alaska.gov

Subject: Comments on proposals for February 2017 Interior Region meeting

Dear Mr. Spraker:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 11 and 12, 2016. The SRC reviewed three proposals that will be considered at the Interior Region meeting in February 2017 and would like to provide the following comments:

Proposal 84: Lengthen the trapping season for wolf in Units 12 and 20E

The Wrangell-St. Elias National Park Subsistence Resource Commission supports the proposal as written. Aligning the state and federal season dates for wolf trapping in Units 12 and 20E will provide additional trapping opportunity and reduce the potential for confusion.

Proposal 90: Expand the Copper Basin community subsistence harvest hunt area by adding a part of Unit 12

The Wrangell-St. Elias National Park Subsistence Resource Commission opposes the proposed expansion of the Copper Basin Community Subsistence Hunt area. The Commission is concerned about the potential for increased hunting pressure in Wrangell-St. Elias National Preserve that could result from this expansion. Additionally, the community hunt is not working. In our October 13, 2016, letter to you, we recommended discontinuing the community hunt and starting discussions with stakeholders in the Copper Basin about alternatives to it.

Chair: Karen Linnell; Members: Dan Stevens, Don Horrell, Gloria Stickwan, Raymond Sensmeier, Robert Fithian, Sue Entsminger, and Suzanne McCarthy



Proposal 91: Modify the hunting season and bag limits for grouse in Unit 12

The Wrangell-St. Elias National Park Subsistence Resource Commission supports the proposed change in harvest and possession limits for grouse in Unit 12 (5 per day/10 in possession, except 2 per day/4 in possession for ruffed grouse). The Commission does not support the proposed change in season dates, however, and suggests modifying the proposal to drop the proposed change to season dates. For several years, the SRC has been hearing about groups of hunters taking advantage of the current liberal bag limits and harvesting large numbers of grouse within Wrangell-St. Elias. We are concerned about the potential for these high harvest levels to impact the grouse populations, and believe that reducing the harvest and possession limits would help to address this issue. With regard to the proposed modification, some local residents harvest grouse in the winter, and the Commission feels that it is important to maintain that opportunity.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Karen Linnell".

Karen Linnell

Chair

cc: NPS Alaska Regional Director
Superintendent, Wrangell-St. Elias National Park and Preserve
Governor of Alaska



Submitted By
Naseef Azan
Submitted On
2/3/2017 7:55:55 AM
Affiliation
Hunter

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To whom this may concern,

For non-residents like myself and my hunting party, hunting in Alaska is truly a dream and an opportunity that does not present itself very often. Unless a person has the ample funds and the available vacation time to take, such trips can be a once in a lifetime opportunity. Fortunately for us, we have been blessed with the chance to come up and hunt for a second time. Our first hunt was for Moose in 2013 which was amazing, however unsuccessful. On July 6, 2015 my two other party members as well as myself booked a caribou hunt with Arrowhead Outfitters to take place from August 21-31 of 2017. This will be our first ever caribou hunt and our second adventure to your amazing state which we are beyond excited about.

With regards to the new proposals that have been recommended for the upcoming Caribou season, we ask that you please take into consideration the limited opportunities that most non-residents have to make trips to Alaska for such adventures. For the recommended bag limit, my party in particular, we each only purchased one tag. We are after adventure as well as to harvest a good representative member of the species. For each person, one caribou will be more than enough and as we have experience in wilderness meat preservation, our intention is to bring the meat home. As for the shortening of the season to the new proposed August 25-Sept 7, this will obviously affect our available time to hunt as our plans are already in place and vacation time has already been asked for. This is truly the part that we ask for you to take into consideration. I speak not only for myself but for the other members of my party, Rick Martensen and Noah Killion, that we are truly grateful for the chance to be able to come up and hunt in such an amazing place and for the fact the seasons are as long as they are for Caribou. This is what makes the ability to plan for these trips easier and achievable. Please take this into consideration.

Thank You



Submitted By
Keith Bennett
Submitted On
2/3/2017 9:06:14 AM
Affiliation
arrowhead outfitters

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Sundance, Wyoming 82729

My wife and I have already gotten a 2017 Caribou hunt booked with arrowhead outfitters and I am very dissappointed that this is all coming up now we have been working on planning a hunt for several years and finally have it booked and now this all is coming up and also the fact that we have already each purchased two caribou tags. I do not think that even if this goes in to effect that it should change things for this current year. Maybe put it in effect for a year or so down the line so non residents know about it before there hunt is booked and paid for I do not think it is a fair shake for the ones who have already gotten there 2017 hunts booked. Please consider the fact that alot of non residents that are already booked in will not be delighted with this change



Submitted By
Craig Bries
Submitted On
2/3/2017 7:50:51 AM
Affiliation
Hunger

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4194315276

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Cedar Rapids, Iowa 52411

I have been planning my once in a lifetime trip with 3 life time friends. This trip as a non-resident has required 2 years of planning, preparation, and significant expense.

I am sensitive to herd management to keep the quality of the animals and for the folks that live off of them. We have had similar issues in Iowa related to deer and CWD and general herd management. One thing from our experience is the focus needs to be the cows. If you want more animals, do not shoot cows, if you want less, shoot cows. Changing bull regulation or season lengths will drive the desired impact as much as cow herd management. I would recommend considering this.

You have a wonderful resource for resident and non-resident hunters and when you shorten a season to only 2 weeks you will simply have certain people from outside the state will have to choose to spend their dollars elsewhere where the environment is more open to their schedule and a good hunting experience. The shortened season also hurts local business as they have less time to interact with hunters and improve their incomes. That in itself is a huge factor to your economy.

While we are already planning to hunt in 2017, a change such as the one proposed would likely change our plans for future hunts due to the uncertainty of knowing a year in advance of what the hunting regulations would be for 2018 or 2019 especially in relation to dates.



Submitted By
Michael Candela
Submitted On
2/3/2017 5:47:28 AM
Affiliation

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February 3, 2017

Dear Alaska Fish and Game,

I am writing you today to express my concern over Proposal 105. It is my understanding that this is set to be presented to you in mid-February. My understanding of this proposal is that it is targeted to increase the caribou herd by 250-300 animals. I have read the proposal and have several concerns that I would like to present for your consideration.

The proposal comes significantly late in the 2017 hunt planning season. I have traveled to Alaska on three other occasions to hunt. My planning starts years in advance. I research locations and outfitters to work with. I confirm my entire hunt and travel plans as the earliest possible date. I need to coordinate vacation time, work commitments, and family time. My pre-planning allows me to resolve all of my personnel and professional issues in advance so once hunt time is here I am able to enjoy my time with friends and family.

My decision to book a 2017 caribou hunt was made based on current hunt regulations that allowed me to harvest more than one bull. In addition, I researched past years and multiple bull harvest has always been allowed in the unit I have chosen to hunt (26B). I have already committed over \$5000.00 to my 2017 caribou hunt. I have secured a transporter, purchased licenses and locking tags, purchased a flight, booked a hotel, and secured a rental car. In addition, I extended my trip in Fairbanks to do some sightseeing (and put some additional money in the local economy).

Now, in the same calendar year as my booking, a change the bag limit is being proposed. This is unfair to the people who have planned for years to make a dream hunt reality. The proposal has very little impact on the resident hunter and a significant impact on the non-residential hunter. It is the non-resident hunter is the one that pours the money into the local economy and supports the ADF&G with the tag fees. Please consider the financial impacts in addition to the unfair treatment of non-residents.

I live in Ohio. We have a fluctuating deer herd. When The Ohio Division of Wildlife wants to regulate the herd, it does it through the harvest of does. To reduce the herd you harvest more does. To increase the herd your harvest fewer does. The number of does determines the numbers in the herd not the number of bulls. Proposal 105 does not adequately address this proven game management technique. It is just an attempt to solve a problem on the backs of non-residents.

Proposed season dates created significant difficulties for non-residents and do not ensure a reduced harvest. As a Superintendent of a school district, it is very important that I and all of my teachers plan vacations that do not interfere with our responsibilities to our schools. One of the reasons I choose this trip is that it did not interfere with the school year and my professional obligations. Limiting tag numbers rather than hunt dates is the only way to ensure the harvest gets limited. In no way can a shorten season guarantee a smaller harvest. It just serves to further solidify the alienation of non-resident hunter.

And we are doing all of this to increase the herd by 300 animals? Is this dramatic of a change is necessary to do that? Does this really make the most sense? Or are they just looking to keep the herd to themselves and not allow others reasonable access to your great land and resources. Acceptance of this proposal will do exactly that. You will be telling the non-resident hunters that they can come but only under terms that resident hunters are happy with. Are we saying that resident hunters are most qualified to make the decision for all Americans and hunters in general?

Acceptance of Proposal 105 will only serve to alienate all non-residents and will not solve any of the problems. If Alaska doesn't need their tag fees and the outfitters don't need our business that is fine with me. I am sure I can book my future hunts in the Yukon. The Yukon Outfitters Association certainly appreciates what non-residents do for their business and the money we bring into their economy. I hope the board considers my comments and look at some different alternatives. Please do not hesitate to contact me if you need additional or clarifications.

Respectfully,

Michael Candela
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Submitted By
Steve candela
Submitted On
2/3/2017 8:24:03 AM
Affiliation

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Ashtabula , Ohio 44004

I am writing this letter to express my deep concern about changing the caribou hunting regulations so late in the season. I have planned this trip well in advance purchased everything from hotel rooms to Rent-A-Car's to hunting permits etc. my decision to book this caribou hunt was based on hunt regulations that currently allowed me to harvest more than one bull. I have already committed well over \$5000 towards this Caribou hunt I have purchased licenses locking tags booked flights and plan to meet family in Fairbanks. At the very least there needs to be some provision for people that find themselves in my position and in the long term I believe the goal should be to find alternative ways to preserve the Caribou herd all at the same time continue to get the economic benefit the nonresident Hunter brings to the Alaskan economy. Just as a sidenote in some of the circles that I am in quitting people are starting to say I bet the Yukon outfitters association will be happy to hear about this. Let's just keep the Brooks mountain range a true national treasure and allow like minded people to continue to enjoy and support Alaska and its beautiful resources proposal 105 will only be only in a nonresident hunters so this letter is sent urging you not to support proposal 105 thank you



Submitted By
Randy Chance
Submitted On
2/3/2017 3:15:05 PM
Affiliation

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greenacres, Washington 99016

I am writing in regards to the change of season and bag limits for non resident caribou hunters.

I have a hunt booked this August through Arrowhead Outfitters. This is a trip I have dreamed of my entire life and have finally been able to save the money to make this trip come true. I have everything all set up and ready to go. We have tags bought, hotels booked, rental cars secured, satellite phone reserved not to mention the gear I have been buying over the last couple years to make this trip a possibility. My partners and I have exhausted a lot of time and energy into this to make this the trip of a lifetime.

To have someone come in on the 11th hour and throw a wrench in your dream isn't very fair. There are a lot of things that can be done to help herd numbers out. I think you have already taken some of those steps by reducing tags to 2 bulls and doubling the cost of tags to non residents but you aren't even willing to wait to see if that will have an impact. I feel you are jumping the gun looking to do too much too fast. I think by reducing the cow season that in itself will make a huge difference. I realize there are residents who depend on the herds for survival, but nobody should be able to shoot 20 a year. That is way more than any family could even consume. According to your data the nonlocal residents are taking the largest toll on the herds. So why don't we cut back a little on the total they can shoot.

I hope you can put yourself in our shoes and realize your effecting a lot of people's dreams by making these changes. I hope before you make such drastic changes you have the courtesy and compassion to give more notice to people. I appreciate your time and hope you take this into consideration.

Thanks!



Submitted By
Luke Conyac
Submitted On
2/3/2017 6:46:27 AM
Affiliation

COMMENT RE: PROPOSAL 105

As a non-resident who purchased my caribou tag in December 2016, along with resident and non-resident hunters, we planned to hunt Unit 26b in early August.

I request that caribou hunting season length for nonresidents in unit 26b remain open for all of August 2017.

With the financial incentives the state made by raising license and tag fees for 2017 but allowing previous rates through 2016, our hunting party, and I'm sure many others, purchased tags before the end of 2016. We purchased based on the season available to hunt at that time.

Given the fact that the state created an incentive to buy tags and licenses early, it is unfair to then drastically restrict hunting opportunity after tags and licenses are sold.

We understand that the health of the herd is vital, and fully support the remaining management practices offered by ADFG, including bull only and bag limit restrictions. I support the elimination of all cow harvest for resident and non-resident to allow the herd to recover, which is more biologically significant than season restriction. ADFG could also limit or eliminate the future tags available for that unit by alerting purchasers at the time of purchase of the closure to tags for 26b. This would restrict the harvest in 26b, but not limit bull harvest to those individual who purchased tags when the full season was offered by ADFG.

We request the opportunity to hunt in early August, as was the case when tags and licences were purchased.

Thank you.

Luke Conyac - 2017 non-resident caribou tag holder



Submitted By
Bob Crane
Submitted On
2/3/2017 9:15:01 AM
Affiliation

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406-665-1006

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bob.crane.b62a@statefarm.com

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PO Box 550
Hardin, Montana 59034

Ladies & Gentlemen,

I recommend that you leave area 26B open to non-residents for 2 bull caribou. If you want to get numbers back in the caribou herd limit or eliminate the cow harvest and encourage or get involved with predator control (wolves, coyotes and bears).

This is not fair to people who have planned vacation times years in advance. It is bad enough for a non-resident to have the game tags and license fees double but to shut the area down to non-residents with this short of a notice is irresponsible and short sighted. This will effect the State of Alaska's revenue stream more than you would expect. I have hunted an fished in Alaska on many occasions and spent alot of money in communities and with outfitters which benefits everyone living in Alaska. You're recent actions will isolate you from non-residents coming in.. Once lost it takes along time to get it back.

Sincerely,

Bob Crane
PO Box 550
Hardin, MT 59034



Submitted By
Cody Drake
Submitted On
2/3/2017 11:31:56 AM
Affiliation

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Horseshoe Bend, Idaho 83629

To whom it may concern,

My name is Cody Drake, myself and 3 of my life long friends have been working on and setting up a trip to go caribou hunting in Alaska for years now. It has always been a dream of ours. So, through saving of money and vacation days we scheduled a trip with Arrowhead outfitters for this year August 10th-19th. As you could imagine we are all very excited to make our first hunting trip to Alaska. Now we were saddened to learn of these new proposed changes, being that the nonresident hunting season doesn't even open until we are to be back home. Our plan tickets are already booked, Alaskan license and tags purchased, hotels in Fairbanks reserved and rental cars paid for. Being an avid sportsman and conservationist I understand the concern with the caribou numbers for changes to be made. Cutting the number of caribou that can be harvested is a logical measure that could be taken, but shortening the non resident season to 2 weeks is not. Coming from the lower 48 with flights and tim restrictions it will be almost impossible to fit a group like ours into a 2 week window. Please take my comments into consideration when making your decisions.

Respectfully,

Cody Drake



Submitted By
Eric Duncan
Submitted On
2/2/2017 6:55:51 PM
Affiliation
Hunter

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503-930-9367

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9617 NW 29th Ave
Vancouver, Washington 98665

I'm writing today to express my strong opposition to Proposal 105. I booked my hunt (August 14-20, 2017) some time ago, and have spent considerable money on licenses, tags, airfare, hotel, transportation and the hunt itself. Making changes to the regulations at this late date would impose a significant financial hardship for me and my hunting partner as much if not all of this money is non-refundable. We had to commit to dates and have locked in vacation time at work for this already. Shortening and moving the season would in all likelihood mean that we would not be able to take this trip of a lifetime. I strongly urge the Board of Game to defer any regulation changes for the current year to avoid these hardships for my group and the many others that have made similar arrangements to mine.

Sincerely,

Eric Duncan

Vancouver, WA



Submitted By
Joe Gasper
Submitted On
2/3/2017 3:33:28 PM
Affiliation

Phone
785-302-1503

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joegasper95@yahoo.com

Address
21 Hillcrest Dr.
Stockton, Kansas 67669

COMMENT RE: PROPOSAL 105

As a non-resident who purchased my caribou tag in December 2016, along with resident and non-resident hunters, we planned to hunt Unit 26b in early August.

I request that caribou hunting season length for nonresidents in unit 26b remain open for all of August 2017.

With the financial incentives the state made by raising license and tag fees for 2017 but allowing previous rates through 2016, our hunting party, and I'm sure many others, purchased tags before the end of 2016. We purchased based on the season available to hunt at that time.

Given the fact that the state created an incentive to buy tags and licenses early, it is unfair to then drastically restrict hunting opportunity after tags and licenses are sold.

We understand that the health of the herd is vital, and fully support the remaining management practices offered by ADFG, including bull only and bag limit restrictions. I support the elimination of all cow harvest for resident and non-resident to allow the herd to recover, which is more biologically significant than season restriction. ADFG could also limit or eliminate the future tags available for that unit by alerting purchasers at the time of purchase of the closure to tags for 26b. This would restrict the harvest in 26b, but not limit bull harvest to those individual who purchased tags when the full season was offered by ADFG.

We request the opportunity to hunt in early August, as was the case when tags and licences were purchased.

Thank you.

Joe Gasper - 2017 non-resident caribou tag holder



Submitted By
Timothy B. Grace
Submitted On
2/3/2017 3:06:32 PM
Affiliation

Phone
573-864-5660

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tandjgrace@hotmail.com

Address
2800 E Cheavens Rd
Columbia , Missouri 65201

Yesterday, I was informed by Arrowhead Outfitters about Proposal 105. My hunting partner, Al Buchanan, and I have already booked our caribou hunting trip (Aug 21-Sep 2, 2017) with A.O. In addition, during Dec 2016 we each purchased two, 2017 bull caribou tags. We have already committed our time and considerable resources to this once-in-a-lifetime hunt for each of us. In good faith we planned our hunt according to the regulations available to us. I understand that regulations need to change from time to time, but ask that you please not change the regulations for those hunters that have already committed their time and resources to a hunt. Thank you for considering my comments, Tim Grace



Submitted By
Aaron Green
Submitted On
2/3/2017 6:48:17 AM
Affiliation

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319-360-2898

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Hiawatha, Iowa 52233

In order to caribou hunt in Alaska as a non-resident a significant amount of time and preparation needs to take place at least 1-2 years prior to making the trip. With vacation schedules due for many at the beginning of each year, the school schedule having to be taken into account for children, and the issues that are present with travel schedules a shortened season will pose even more issues.

You have a wonderful resource for resident and non-resident hunters and when you shorten a season to only 2 weeks you will simply have certain people from outside the state will have to choose to spend their dollars elsewhere where the environment is more open to their schedule and a good hunting experience. The shortened season also hurts local business as they have less time to interact with hunters and improve their incomes. That in itself is a huge factor to your economy.

While we are already planning to hunt in 2017, a change such as the one proposed would likely change our plans for future hunts due to the uncertainty of knowing a year in advance of what the hunting regulations would be for 2018 or 2019 especially in relation to dates.



Submitted By
Bud Grimes
Submitted On
2/3/2017 3:40:53 PM
Affiliation

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Inver Grove Heights, Minnesota 55076

I am a non-resident hunter that has been planning/booking a once-in-a-lifetime early August 2017 caribou hunt with outfitter for over two years. We were planning to hunt in GMU 26B. I understand that a shorter season is being contemplated for this area (August 25-Sept. 7, 2017). Please consider expanding the season to at least August 1 - September 7, as well as a two bull limit for non-residents. Our travel plans include not only hunting, but also over a week of sightseeing in the Anchorage/Denali/Fairbanks area. Should our hunting dates need to change on short notice, we would be greatly inconvenienced and would surely incur a financial impact due to cancellation/change fees with airlines, hotels, car rentals, etc. Thanks you for your consideration of this request.



Submitted By
Tom Grimes
Submitted On
2/2/2017 7:01:18 PM
Affiliation

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2019 Ualakaa Street
Honolulu, Hawaii 96822

I understand that a shortened season for non-residents in unit 26B is being considered for the dates of August 25-Sept. 7, 2017. I am a member of a party of three non-resident hunters and we have already booked a hunt with an outfitter for August 3-13, 2017. In addition, we have scheduled vacations from work, and made airline, car rental, and hotel reservations. If the hunting dates are changed on short notice, as you are proposing, we would not only miss our hunt but likely would take losses on the reservations we have already made. Please consider expanding the season for non-residents to August 1- September 7, 2017. I would also request that you place a two bull limit on caribou for non-residents. We are responsible hunters. Thank you for your consideration of this request.



Submitted By
Marcus Hannah
Submitted On
2/3/2017 1:02:24 PM
Affiliation

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I was just made aware of the proposal to limit the the number of caribou that can be harvested in 2017 by non-residents from 5 to 1. Also of the shortening of the season. I am part of a group that started planning a Caribou hunt early last year for Aug of 2017. We have all bought our tags for 2 Caribou each and have dates set for the hunt. Under this proposal, we will need to change the dates of the hunt or possibly have to cancel it altogether. We also will have wasted our money on tags that we will not be able to use. As we are coming from Hawaii, you can understand the difficulty of coordinating a hunt like this. We are all very excited and have been purchasing the necessary gear as well. I understand the importance of keeping the herd #'s up and agree that actions should be taken. But to do it at the last minute is unreasonable for those of us that are not over-harvesting and are already significantly invested in the the experience.



Submitted By
Kevin Hansen
Submitted On
2/3/2017 2:41:04 AM
Affiliation
self

Hello.

I am commenting in reference to the RHA proposal for Unit 26B. I respectfully but most vigorously oppose this proposal for the following reasons:

My caribou hunt is a 30 year dream that due to parenting responsibilities, finances, and job (coaching) responsibilities has been put on hold for all these years. 18 months ago a long time friend and I were finally able to book this hunt and have been excitedly planning it ever since. Part of that planning included purchasing my caribou lock tags in December of this past year (2016). Because of the way the then current regulations read I purchased two of them for the unit we would be hunting. If the RHA proposal passes I would only be able to use one of my tags in Unit 26B.

Even worse, since my teaching responsibilities resume in mid August of each year, passage of the RHA proposal would mean the season no longer aligns with my work schedule.

I sincerely thank you for taking into consideration my comments, and again reiterate my opposition to the RHA proposal for Unit 26B.

Respectfully,

Kevin J. Hansen

Zell, SD



Submitted By
Dominic Henriques
Submitted On
2/3/2017 4:59:07 PM
Affiliation

I am a nonresident hunter who has been enjoying your State for over 20 years for both fishing and hunting on many guided and unguided trips. The ADFG has done an outstanding job of managing the wildlife and providing hunting and fishing opportunities like no other state in America. I have partnered with a group of 10 nonresident hunters and aquired Arrowhead outfitters more than a year in advance for this caribou season in mid August. We have purchased 2 tags, licenses and much of our gear in anticipation of this hunt. It is my understanding the proposed rules are to assist in increasing the herd size by shortening the hunting days and reducing the harvest number primarily to the nonresident hunters. The recommended increase is less than 300 animals which is very insignificant amount regarding a herd of the CAH size. I would ask that due to the insignificant variation in herd size which would not have a long term impact on the herd size that the decision to make these changes durin this current season is unfair and too quick to draw a conclusion. Please continue to allow the nonresident hunters 2 bulls until further information can be concluded.



Submitted By
Chris Kapral
Submitted On
2/3/2017 5:56:56 AM
Affiliation

Phone
616-915-2941

Email
chris.kapral@perrigo.com

Address
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Alto, Michigan 49302

My name is Chris Kapral. I am from Michigan. Each year I plan for and make a hunting trip to the Western United States or Alaska. My hunting parties consist of 2-6 guys and the group of guys with whom I hunt are sportsmen in every sense of the word. We live to enjoy the variety of hunting experiences and species country has to offer. Care of meat is of great importance to us as we always make arrangements to transport it home to share our "exotic" game with friends and family. Additionally, since our group consists of guys with varied economic means and physical condition, we typically try to schedule our trips 1-2 years in advance.

Hunting caribou on Alaska's north slope has been on our bucket list for a number of years and after a lot of research and reference checking, in Fall 2016, five of us booked a 2017 trip with Arrowhead Outfitters.

We just learned of a proposal to reduce the allowable harvest from five animals to a single bull caribou and to reduce the season length to Aug 25-Sept 7. While I respect and support the need to properly manage Alaska's game resources, these changes hit me as being quite draconian and if enacted, will severely limit non-resident hunters' ability and willingness to hunt this resource. Additionally, these changes would also mean that should we wish to come back for another hunt in the future, we will be unable to bring our children who are still in school.

Therefore, I would ask that the Alaska Dept of Fish & Game consider the commitment of time, planning and expense of non-residents when contemplating the regulatory changes for caribou hunting later this month and make the reductions in season length and bag limits less severe.

Sincerely,

Chris Kapral



Submitted By
Nicholas Kapral
Submitted On
2/3/2017 3:28:11 PM
Affiliation

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Manitowoc, Wisconsin 54220

To: The Board of Game:

I am submitting comments in regards to Proposal 105-5 ACC 85.025, specifically, the changes to non-resident caribou regulations in unit 26B.

As a NR hunter, traveling to Alaska to hunt requires intensive planning many months, often times a year or more, in advance of the hunt. This includes making significant financial, as well as personal, commitments in order to secure the necessary logistical accommodations and vacation time needed to accommodate several days of travel alone. The proposed changes present some challenges, especially for us NRs that have already made commitments and arrangements to hunt caribou in Alaska in 2017.

In the proposed changes, I am supportive of a reduction in NR caribou harvest limits to Bulls only and eliminating all NR cow harvest. As opposed to a 1 Bull harvest limit, I am proposing a revised reduction from 5 Bulls annually to 2 bulls annually for all NR caribou hunters. Furthermore, the proposed revised NR season dates of Aug 25 - Sept 7 will virtually eliminate the opportunity for a significant number of NR hunters all together. The logistical resources available will not be able to handle the current number of hunters in such a short amount of time. The flexibility of scheduling hunts will be eliminated leaving many NRs without any opportunity at all due to work, family and personal obligations during the proposed shortened two week season. I propose a shortened NR season, but one that would run ~4-6 weeks from approximately Aug 1 - Sept 7. These proposed dates will protect caribou during critical calving time periods while still offering NRs a legitimate opportunity to schedule a 5-10 day hunt.

The proposal's concern for lack of in-field judgement (wound rates) and wanton waste due to inability to properly care for meat is something I can relate to and is of utmost importance to me. If hunters are demonstrating an inability to care for meat properly due to negligence and/or poor decision making, I believe other measures can and should be taken to address the issue as opposed to significantly reducing and nearly eliminating the opportunity for all NRs to experience a Northern AK Caribou hunt. As validation of my thoughts on this subject, I want to note that I have hunted bison in AK, was successful, and experienced the rigors of extracting every pound of meat from the field by pack frame and raft, securing space on a freezer truck and paying for transportation back to WI so that I could ensure every pound of the animal was responsibly cared for, preserved and is currently providing numerous meals for myself, family and friends.

I appreciate the Board of Game taking the time to consider my comments and revisions to the proposed caribou hunting regulation changes in Unit 26B.

Sincerely,

Nicholas Kapral



Submitted By
Jon Kee
Submitted On
2/3/2017 9:28:51 AM
Affiliation

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907-299-2617

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jonkee718@hotmail.com

Address
39068 Whitney St
Anchor Point, Alaska 99556

These comments pertain to proposal 105. I would like to request that caribou hunting season lengths for nonresidents in unit 26b not be significantly restricted for 2017. With the financial incentives the state made by raising license and tag fees for 2017 but allowing previous rates through 2016, our hunting party, and I'm sure many others, purchased tags before the end of 2016. Our plan is to hunt in unit 26b in early August, and our party includes nonresidents. Given the fact that the state created an incentive to buy tags and licenses early, it is unfair to then drastically restrict hunting opportunity after tags and licenses are sold. We understand that the health of the herd is vital, and support other management practices including bull only and bag limit restrictions. We would just like to have the opportunity to hunt in early August, as was the case when tags and licences were purchased. Thank you.



Submitted By
Jaison Kenney
Submitted On
2/3/2017 10:09:32 AM
Affiliation
Non-Resident Hunter

I would like to comment on **Proposal 105** concerning unit 26B. It has been a lifelong dream of mine to go to the great state of Alaska to do a DIY caribou drop hunt. After many years of saving money and accruing enough vacation time I was able to start turning my dream into reality. A friend and I have already booked an air taxi, flights from PA to AK, a rental car, hotel accommodations, and posted vacation time at work for an Y2017 August 21st – September 1st caribou hunt in Unit 26B. We purchased two caribou tags as well in anticipation of the hunt. We have spent countless hours preparing for this hunt. We are both avid hunters and understand the importance of respecting game animals and not wasting the meat that they provide. I think most all other hunters who travel to AK to hunt have the same amount of respect for these animals.

The proposal suggests changing the harvest limit from 5 bulls down to only 1. While I agree that 5 bulls is probably too much I think that 2 bulls is still reasonable and manageable (our air taxi only allows for 2 bulls). The proposal also asks to shorten the cow season. I think that there should be NO cow season for non-resident hunters. Lastly the proposal asks to shorten the non-resident hunting season from August 25 – September 7. The air taxi that we are using won't fly after September 1st due to potential weather conditions/concerns. With this short window it would not allow for any delays that may arise.

If the committee does decide to make these changes they should also decide to wait until the Y2018 or Y2019 to implement them since many hunters who share my dream of hunting for caribou on the tundra have planned for the hunt well in advance of this year.

Kind regards,

Jaison Kenney



Submitted By
Will Kiehne
Submitted On
2/3/2017 5:56:11 AM
Affiliation

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To whom it concerns,

I am currently booked to go on a hunt of a life time this August (2nd through 8th) with Arrowhead Outfitters. We will be hunting for Caribou north of the Brooks Range. It has been a dream of mine to hunt for big game in Alaska since I was a young boy. I am a middle school math teacher in a small town outside of St. Louis, MO and finally decided to go after my dream hunt several years ago. After saving money for a couple years, I finally booked a hunt for August 2017 last spring. Since that time I have been buying gear and reading up on the hunt to gain as much knowledge as possible about my upcoming adventure.

In December, I heard that the State of Alaska would be doubling the price of licenses for out of state hunters due to the passing of HB 137. I was fine with this, and understood why. I was also grateful that I was given the opportunity to purchase my license at the old price, and did so. My hunting partner and I both bought our 2 caribou tags along with our hunting and fishing license for our upcoming trip. But, when I found out less than 12 hours ago about proposal 105, I was overcome with several emotions including anger and saddened. After sleeping on it, I am more confused than anything else. This has been a dream hunt since I was a little kid watching hunting shows of guys I looked up too hunting in Alaska. And it started to become a reality last spring when I booked this Northern Brooks Range Caribou Hunt last spring. It finally became real after I acquired all the extra special gear I did not have, the plane ticket from St. Louis to Fairbanks, the rental car that we will be using for the two weeks while up there, and all the countless hours spent dreaming and reading about the great north.

To hunt Alaska as a nonresident, one does not plan a trip on a whim. Years are spent on planning, preparation, and saving. By passing proposal 105 this late in the game, affecting the 2017 hunting season, you are ruining the hunts that countless caribou hunters have planned for, paid for, and dreamed of. I understand the fact to regulate out of state hunters, but to do so this close to the upcoming season is ridiculous. The majority of out of state hunters already have planned their 2017 caribou hunt and by making these changes all of these people will be out hunts and money. The biggest problem I have with proposal 105 (besides it being effective immediately) is the shortening of the season. By pushing the start date back to late August you are taking away the possibility of students, teachers, and families to hunt. Being a teacher it is difficult for me to get a multiple weeks off in a row. What was so nice about this season starting August 1st was that I could hunt before the new school year started.

I understand the need to make changes on hunting to out of state hunters, but by doing this where it affects the people who have already booked hunts for this year is unethical. I truly do not understand how such dramatic changes can occur this quickly, with so many people being affected. My true passion in life is hunting and fishing, and Alaska is the king of all. Each year I explore new states and territories and have already looked into coming back to Alaska for a spring bear hunt in 2018. I can assure you that if this bill passes I will never come to the state of Alaska. With hopes and dreams of hunting all throughout your beautiful state it pains me to say this, but is true. If this is how we fellow hunters will be treated then I can find other places that will fulfill those dreams and not have to worry about a proposal being pushed through last second to end that trip. If this proposal passes, I will be out thousands of dollars. As a 27 year old middle school teacher, this is a big blow. I ask you to please not pass this bill because too much is at stake for hunters like me who were looking so very forward to their upcoming 2017 Caribou hunt. Thank you for taking the time for reading this.

A concerned hunter,

Will Kiehne



Submitted By
Scott LaRue
Submitted On
2/3/2017 8:45:44 AM
Affiliation

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My home is in Hawaii but Alaska is one of the most beautiful places we have ever visited. My family and friends have enjoyed many visits to the National Parks, fishing, and hunting. My boys are 7 and 9 and at that golden age where they still love to be with their parents and enjoy travel and outdoor adventure with us. As they get older and become responsible hunters we look forward to more Alaska trips. We need to plan well in advance for our travels booking a year in advance to coordinate vacation time and school schedules. The 2-week season for non-resident hunters is too short to allow for scheduling trip to Alaska. It is my understanding that the proposed changes will also effect the 2017 season which I booked in the Fall of 2016. The costs to change my travel plans would be enormous. Please reconsider your desire to shorten the season for non-residents. We love traveling to Alaska for all that it has to offer and want to continue to be regular visitors to your beautiful state.



Submitted By
Leslie R Lloyd
Submitted On
2/2/2017 1:36:54 PM
Affiliation

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Dear Alaska Dept. of Fish and Game,

I am writing to express my concerns to ADFG proposals to proposal 105.

First, I would like to say that I am a pilot for one of the largest air taxis operating in 26B during August, transporting caribou hunters into and out of the field. I work for Arrowhead Outfitters and we are the only floatplane operator in the area (that I am aware of). I have been flying for Arrowhead for the past 4 seasons and we operate primarily within a 50-mile radius of Desiree Lake (located 50 miles south of Deadhorse on the Dalton Highway).

During the past 4 years, I have seen a wide fluctuation of caribou numbers in this area throughout the month of August. One day I would fly and see very few caribou or several small bunches scattered around and then a week later they would be everywhere, or there would be few caribou on the flats but find them in the mountains. Additionally, I have seen no, or very few bulls early in August and then the last week of August they would show up all over the place. In 2016 the first two and a half weeks I only saw small bunches of caribou scattered all over and they weren't really moving around. Possibly due to the lack of bugs forcing them to keep on the move, but by the end of the month there were larger groups starting to move around and the number of bulls seen had increased significantly.

Changing the opening date of the season would have a very significant impact on Arrowheads operations. Since we are a Float plane operation, we try to be off the north side of the Brooks Range by the end of August due to the risk of the weather changing and the lakes freezing. If the season were to open August 25 we would be realistically shut down for caribou hunting. It would be unrealistic to only operate for one week. Additionally, we have clients already booked for 2017 and 2018, who have all made their travel arrangements and would incur substantial financial penalties associated with changing all their reservations. Another thing to consider is that a caribou hunt is a great hunt for families to participate in. An August 25 opening would curtail for many this wonderful bonding time due to children having to be back at school before the third week of August. I believe that the operators in Happy Valley would express these same concerns. I would like to see the season opening date August 1 – September 7 for non-resident hunters. This still reduces the hunt but stays within a reasonable timeframe.

I do support the change to move the start date for cows to August 1 but prefer to see that the cow harvest stop all together, for everyone.

Now as to how to reduce the numbers of caribou harvested I do support a one bull limit. I also can understand raising the cost of the non-resident harvest tag. That cost alone will reduce the number of caribou taken. I don't think that non-resident hunters would shell out the extra money for a second ticket. I believe that this is all that really needs to be done to achieve the goal of a 300 caribou reduction in the harvest number. I think if ADFG were to do this that Arrowhead Outfitters alone would show a reduction of 50 caribou.

Sincerely,

Les Lloyd



Submitted By
Bruce McDermott
Submitted On
2/3/2017 1:40:50 PM
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Hunter- State of Montana

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--Greetings from Montana--

Regarding proposal 105, unit 26B: (opposed)

I am a 52 year old hunter from Montana. I have hunted fair chase for 40 years in my home state. Coming from a state with plentiful big-game hunting opportunities and resources, I completely understand the concerns of the 'local' Alaska sportsmen and women considering they have invested themselves by living in Alaska, pay taxes in Alaska, endure the tough winters, and have a vested interest in the natural resources within the state. That said, I am able to be objective in this way because I have the same concerns within my own state regarding our resources.

I am not to be regarded a wealthy out-of-stater coming to Alaska to exploit the plentiful and amazing game resources which Alaska is so blessed to have. I am a law enforcement officer of 28 years and have not been fortunate enough financially to hunt out of my home state. I always planned to hunt caribou 'one day'. This species is the dream hunt for me and I always dreamed of doing so in Alaska rather than Canada. As luck would have it, I decided to check this off my 'bucket list' this year along with my brother and 2 good friends (first hunt of this kind for each of us).

We have been planning this hunt for 2 years and have already prepaid this hunt for the year 2017. We have paid our outfitter fees, purchased our licenses (I purchased 2 caribou licenses), paid airfare for August 7th departure from Montana, paid down on our vehicle rental, equipment rental, etc. As you can appreciate, our dates are set and our work schedules are coordinated with vacation and families summer plans adjusted accordingly.

With regard to the Alaska sportsmen/ women concerns about wanton waste of game animals, I could not agree more with this legitimate concern. In these days of financial tough times and considering the poverty we see in our own country, it is downright sinful to waste any portion of an animal suitable for food. I agree that 5 animals per hunter would be nearly impossible to manage without waste. Our outfitter, of his own volition, limits his hunters to only 2. I had considered only harvesting one animal; however, considering that this will be my one and only hunt of this kind, I could not pass on the opportunity to harvest 2 animals if I was so fortunate. I have done considerable research on how to best preserve the meat from spoilage and am confident we will not waste one bit.

In my home state of Montana, I have 3 children (all adults now) and we draw or purchase numerous permits for antelope, deer, elk, and an occasional sheep. In consideration of the number of animals we harvest locally, it isn't conceivable that we can utilize all of this meat. As a result, I have, for years, processed what we could use and then process the additional meat for friends, family, neighbors, etc. I am also a proponent of Hunters for Hunger and donate to this great program. It is a win, win situation for all.

I have already prepared a preferred shipper account with Alaska Air with intent to ship and much meat home as it financially and realistically feasible. In choosing to harvest to animals, I certainly expect that I will be seeking to share meat with the native Alaskans (a custom/practice I have been made aware of). Yet another win, win situation for all.

Certainly the sportsmen/ women of Alaska realize and appreciate the benefits of revenue brought into the state by out of state hunters. I cannot deny the importance in seeing it here in my own state. I realize that the Alaska sportsmen/ women do not want this revenue at the expense of their own hunting interests or ability to manage their resources. I feel the same way about the fish and game in my state.

It is really not unreasonable to allow an out of state hunter to harvest 2 caribou and expect the hunter to be able to effectively care for the meat. With regard to the proposed season change, I cannot, in fairness, weigh in on this issue except to address my party's issue for the 2017 season. We have purchased our permits and reserved our gear, vehicle, airfare all around the early August timeframe. We planned according to the seasons as they were listed, in good faith. I can understand if you choose to change the season a year later.....this way hunters can plan to hunt or choose not to plan a hunt based on what they know.

I will not ramble on any further. Please know I share your concerns and understand how no person will care as much about the resource as those who live by and depend upon the resource. I also know that there is room for compromise so that we all can experience what makes Alaska so rich and great.



Submitted By
John
Submitted On
2/3/2017 11:56:45 AM
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To whom it may concern,

I am responding to proposal 105... reduction of caribou for non-residents from 5 to 1.

My hunt group of 4 members is scheduled to be flown in to unit 26B by Arrowhead Outfitters this coming August. It is a trip we have been planning and saving for the last 3 years. One of the reasons for choosing AK and Arrowhead was ability to take 2 caribou. In fact all four of our party members have purchased 8 tags in 2016 to avoid the increase in pricing effective this year.

While I believe the taking of 5 caribou is unreasonably for anyone other than subsistence hunters, it is my understanding that the reputable outfitters like Arrowhead have limited out-of-state hunters like myself to 2 animals.

I would ask you to take into consideration these comments and consider the planning that has taken place for us to make this a trip of our lifetimes.

Sincerely,

John P. McDermott, Billings, MT



Submitted By
Ron Mingo
Submitted On
2/2/2017 7:03:19 PM
Affiliation

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Re: Interior/Northeast Region Comments

First I would like to thank you for receiving my comments and reading my concerns.

My name is Ron Mingo and I visit Alaska frequently as my son and his wife live there and contribute to the well being of many of the residence accross the great state of Alaska. My son is a biomedical Engineer that flyes to many of the remote villages and repairs all sorts of medical equipment for use in those villages, cities and towns. His wife is a registered nurse who tends to critical patients in the ICU department in Anchorage. My wife and I save our money so that we can take one trip per year to visit our children. We have booked a caribou hunt with the families well in advance of the license increases and paid for our flights also in advance. At this time I also purchased 2 caribou tags which are quite expensive. But we feel to be with our family in one place, especially Alaska is well worth it. But with the new propoal that has been introduced this year puts my family in somewhat dire straits with vacations for the year already put in. I feel that what is being done may be admirable but needs to have a grand father clause for people who have already paid and taken vacation. As residence of Alaska you know tourism is a very important part of the economy and should be preserved. I am not even sure of the leagle ramifications or if the state is liable as well as the outfitter for paying back all losses. So please review and remember many familys are involved in your decisions.

Thank you for your Time



Submitted By
Lee Molitor
Submitted On
2/3/2017 10:35:05 AM
Affiliation

~I am writing concerning the proposal to change the regulations for the 2017 caribou season in unit 26B. Being a non-resident we booked our hunt over a year ago and this would affect our trip greatly, the time we have already scheduled off work, flights we have booked. We already have licenses 2 Caribou tags purchased for this hunt (We are hunting for bulls). I would ask that you don't approve the changes and keep the current regulations. There has been a lot of time planning and money invested in organizing this potentially once in a life time trip.

Thank you for your time and consideration.



Submitted By
Victor Nelson
Submitted On
2/3/2017 6:40:28 AM
Affiliation

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Hello, It has been brought to my attention that there are dramatic changes, proposal 105, to the carabou season in 26 B . I am part of a four party group that has booked and paid for a hunt with Arrowhead Outfitters for the 2017 season. Vacation time has been booked, tags purchased, equipment bought all of these items are a mayor finacial investment. We have been planning this trip for a long time. One of the things that drew us to hunt Alaska was the longer season and the stability of quotas. Planning a hunt so far away requires most of the planning, booking and vacation time be done well in advance. The price of both tags and air service is such I cannot afford to gamble on the ability to hunt. While there is no arguement that changes to game regulations are part of good management, changes in season lenght and quota changes in the same year as the hunt are very difficult to deal with. As nonresident hunters the amount of money put into both the Department of Game and Fish and the local economy is huge. No one is asking your department to stop managing your resources only plan far enough out so as not to waste my funds on tags I cannot fill and time off that I cannot use. As a sportsman I enjoy the hunting offered in Alaska and have hunted there three times in the last ten years and plan to do so again. However, if season lenght and quotas are going to be changed this quickly it forces me to take a second look at were I can spend my hunting dollar. Please do not penalize our party for booking far enough in advance to ensure reputable air service and a time slot that fits our vacation time options. The stated opinion offered that nonresident hunters care little for wounded animals or only worry about meat care after the shooting stops is not only wrong but offensive. With the waste fines as high as they are economics alone puts this first and foremost on minds. I have been hunting since old enough to obtain a permit. Never has any meat been wasted. A sportsman is a sportsman no matter the liscence plate that hanges on their vehicle. This misguided opinion offered unfairly puts all nonresident hunters in a small group of unethical hunters both resident and nonresident. Allowing comments like that to affect hunting regulations is terrible. There are strict laws regarding behavior like that which means it is an issue for enforcement not game quotas or season lenght. As a lawful ethical hunter I feel it is unfair for opinions like this to be held against me. The only part of the rha proposal I can agree with is the elimination of the cow season. Cow seasons are for subsistance hunting and dramatic population control only!!!! Since the population seams to to be in slight decline ending the cow season seems to be a no brainer. If quotas must be cut cutting it in half seems to be far more sensible. Lastly shorting the season as dramatically as proposed only makes it very difcult for nonresident hunters to bring families and get vacation time. The best way to slow the income from nonresident hunters to make it difficult to get the next generation started. This in turn makes it hard for outfitter and air taxies to be profitable.. Which effects both the profitablility of the Game and Fish and the local economy as well.

Thank you for the chance to comment

Vic Nelson



Submitted By
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Submitted On
2/3/2017 10:45:37 AM
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In regards to proposal 105: I have appreciation for the boards consideration for this herd. I am a 6-year resident of Alaska. I have hunted the CAH each of these six seasons and have done so in several different formats. I have hiked in on my own, hunted from the road, brought non-resident friends and hiked in, and also brought non-resident friends and flew in with an outfitter. While I don't claim to be an expert, I do consider my opinion to be educated. I am not a guide or professional hunter. I am a nurse. I live in Fairbanks. I am passionate about hunting.

Initially, The story listed by the Resident hunters of Alaska is certainly one that HAS happened. In my experience up there I can attest that this is NOT the norm. The statistics listed within the proposal attest to this. In the last six years only two non-residents have harvested more than two caribou. The only instance I've heard of non-local residents harvesting more than 3 caribou have been from non-local residents hunting via dog team during the spring season. I acknowledge that this is anecdotal evidence. But in that regard, its no different than the story of the gun-smoke caribou massacre presented in the proposal.

In regards to Wanton waste. I would be happy to testify to my observations that the residents are just as likely as non-residents to commit this offense. Throughout Alaska, I have in fact witnessed it in the hands of residents MORE than non-residents. I have two very distinct memories from unit 26B where a young resident military gentleman was hunting with his non-resident father. They did a terrible job of caring for the meat that they did harvest and much of the animal became wanton waste. This is not a fault of the non-resident as a populace in general. This is a fault of poor education. And also, just poor moral aptitude for the resource. It has nothing to do with residency status.

Lastly, the data does not support that non-residents are the cause of population decline and so I would not support changes that don't solve the listed problem. The problem is not associated with allocation and as such, allocation adjustments should not be used to correct it.

There is a comment in the proposal's cost analysis that "the proposal would not result in any additional cost to the department." I challenge this by adding that the reduction in non-resident hunters by shortening the season to August 25-september 7th would result in a dramatic decline in *revenue*. The department would not collect the revenue from their licenses and all of the business along the Dalton Highway corridor would suffer. Additionally several outfitters would face severe problems.

The outfitters on the north slope serve residents and non-residents without discrimination. Their operable season is primarily in early August. One outfitter in particular has to leave by the end of August because weather conditions start to change and the lakes start to freeze. With such a short season. The outfitters would be given a very small window to serve the demand and create enough revenue to maintain operability. With no motorized land access, people just aren't going to make that trip if they can't be outfitted by air taxi. If they do chose to hunt, it may create a situation where even more people would take up "road hunting" along the Dalton highway; creating more road wear and an increased safety hazard to the commercial vehicles beyond what already exists. As a result, residents like me simply won't bring their non-resident friends and family members up there to hunt. Again, this greatly decreases revenue to the state, sales to the business on the corridor, and drastically alters the department's harvest objectives. This may lead to a dramatic decrease in total harvest; perhaps even to a number below the department's harvestable surplus objective.

My proposal considers the need to protect the calves during the summer months and the states harvestable surplus goals:

Season dates for non-residence would be appropriate if they were August 1st - October xx.

Bag limit: Residents: 5 caribou total. No more than 3 can be cows.

NR: 2 caribou by harvest ticket. Bull only or perhaps only 1 can be a cow.

Consider informing the public of your management goals and request that you'd prefer they don't harvest cows! This can work. In 2016 the department made a press release regarding the Nelchina herd and requested that people DO harvest cows. As a result, my friends and I obliged and filled our tags by harvesting two cows.

Education does help.

Please contact me directly via my cell phone if you'd like me to further describe my experiences cited in forming the opinions I've presented today.

Thank you for your consideration.

Sincerely,

Steven J Opat

Faribanks Alaska

507-259-0697





Submitted By
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Submitted On
2/3/2017 11:20:34 AM
Affiliation

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Opposed to rule changes in 26B

This will be my 6th trip to hunt in Alaska. I am bringing my 20 year old grandson and 2 other hunters for the first time. We have spent a year planning this trip and have about 25,000 invested in non-refundable airfare, vehicle, outfitters, equipment rental and tags. I think it is unfair to change the regulations at this late date. My grandson has saved for 2 years to make this trip with me. If you are concerned about herd numbers you should do away with the cow season or at least to a time they do not have young depending on them. Nonresidents spend millions of dollars in your State please consider how this affects them when you consider changes.

Thank you

Dick Peerson



Submitted By
Matthew J Rimiller
Submitted On
2/3/2017 1:32:29 AM
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Please consider rejecting or postponing (for at least a year) the last minute proposed changes to the 2017 Caribou Hunting Season presented by the Resident Hunters of Alaska. This proposal is a hardship to non-resident hunters who have already purchased (2) Non-Resident Caribou tags for the 2017 Hunting Season. These hunts were scheduled sometimes a year or more in advance, and therefore, proposed changes should take at least that long to be fair. Also, I have yet to see convincing evidence that the herd in question is declining in numbers, as opposed to simply combining with adjacent herds. The hardship described above to non-resident hunters extends to Alaska airlines, state hotels, vehicle rental establishments, big game transport outfitters, and many other businesses.



Submitted By
kyle scott shoman
Submitted On
2/3/2017 10:20:33 AM
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This comment is for the 2017 Caribou hunting in unit 26B Proposal 105.

I just wanted to express my concerns of this proposal for the Alaska Caribou season of 2017. My group and I (6 in total) have had a trip booked for a year and a half now and looking forward to coming to Alaska. Our main reason we decided to come hunt this area was because we could hunt 2 caribou each and it looks like some beautiful country. The reason we would like to take 2 caribou each as this will be the first caribou hunt for all of us and ideally if we are lucky enough would like to take one and then have an extra tag in our pocket to mainly trophy hunt for another. This being said more than likely not all of us will end up shooting 2 as I am guessing the odds of all 6 of us seeing a caribou that is substantially larger than the rest is very unlikely. The other reason on top of that is it is very expensive to fly to Alaska, rent a car to drive to our location, and take a bush flight in to hunt. This is another reason we would like the chance to be able to take 2 caribou as for many of us this will be a once in a lifetime trip up to Alaska to hunt.

Thanks,

Kyle Shoman



Submitted By
Adam Stencel
Submitted On
2/3/2017 5:11:14 AM
Affiliation

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Commenting on changes in regulations to caribou hunts in 26b. I booked a non resident hunt with arrowhead outfitters 2 years in advance. My vacation days are already scheduled and plane tickets purchased and the shortened season is past my hunt which is scheduled aug 20 to the 26. I also have purchased 2 caribou tags and have invested thousands in this hunt. Thank you for your time



Submitted By
Ethan Stenger
Submitted On
2/3/2017 7:42:02 AM
Affiliation

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Hello,

I would like to give some brief comments on the proposed changes submitted by the RHA on caribou hunting in the Northern Brooks Range. My first comments come on the timing of the proposed changes. I understand that wildlife are one of the most important resources to the state of Alaska but the timing of these changes would mess up all of the hunts that have already been planned for the 2017 season. Trips to Alaska, as you well know, require a great deal of planning and preparation, and for my hunt in particular, plane tickets, tags, vehicle rentals, gear purchases, among other things, have already been purchased. The proposed changes would prevent me from going on the trip when all of these plans have already been made. I also assume this would be the case for everyone else that has planned hunts for 2017.

Now getting in to the actual changes, I support the proposal that Arrowhead Outfitters is proposing. The RHA is suggesting that the number of caribou that can be harvested decreases from 5 to 1. Arrowhead Outfitters only allows their hunters to harvest 2. This is a clear sign from the start that they have been doing a better job of managing the herd leading up to this change. I feel that reducing from 5 to 2 instead of 1 would effectively increase the herd size with the recommendation of the biologist.

As far as the proposed hunt dates go, starting the season on August 25th would not allow this hunt to happen for myself or my hunting partner, but also it would eliminate all teachers and students from ever being able to participate in this hunt. I believe that Arrowhead's proposal gives a clear and adequate outline of a season that would make more sense.

Once again, I understand the value that game and wildlife have to the state of Alaska and for that matter, to states all across this great nation. I also understand that the RHA wants to limit non-residents from enjoying the same opportunities that they wish to have for themselves. If that is the message that the state wants to send, then so be it. It was my goal that I would return from this trip, not only with the experience of a lifetime, but also an advocate for the opportunities that Alaska offered. However, if the RHA's changes are accepted and we are not able to make the trip, not only will I lose all desire to ever step foot on Alaskan soil, but I will also ensure my friends, family, and all personal contacts feel the same way.

Regards,

Ethan Stenger



Submitted By
Edward G Stratman
Submitted On
2/3/2017 9:58:58 AM
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Non-Resident Hunter

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I am beginning to be quite frustrated with Alaska's last minute changes for Non-Resident Hunter Regulations. Last year(2016) we lost several hundred dollars because of last minute changes for Non-Resident hunters in the Kotzebue area. These last minute changes show a lack of respect and disregard for all the Non-Resident hunters who have made plans, reservations, and invested thousands of dollars a year or more in advance. If changes are proposed, at least take into consideration all the Non-Resident hunters who have spent thousands of dollars for flight reservations, accommodations, and other expenses. Do not make the proposed changes to take effect immediately; rather put them into effect for the next hunting season at least one year off or longer. It takes at least a year or two to make such plans for a hunt in Alaska as a Non-Resident hunter. I would support some of the Outfitters who suggest shutting down the Cow season to Non-Resident hunters, and reducing the Caribou Bull harvest to one or two bulls. I believe the proposed Hunting Season for Non-Resident hunters from August 25 thru September 7th is too short. I also believe it should be more like August 1st thru September 7th for Non-Resident Hunters, especially now that all of our hunts have already been reserved, and flights and other accommodations have already been made.



Submitted By
Howard Tieden
Submitted On
2/3/2017 4:06:29 PM
Affiliation
Owner of Arrowhead Outfitters, LLC

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aoutfit@outlook.com
Address
5744 E Rutan Avenue
Wasilla, Alaska 99654

Proposal 105 submitted by the Resident Hunters of Alaska (RHA)

As one of the largest outfitters that utilize this area of 26B, I would like to say that I do not feel the count is accurate. On this, the Biologist for Alaska Department of Fish & Game (ADF&G) Ms. Lenart and I agree to disagree. Without flying a grid, it is almost impossible to get the accurate information as there could be thousands of caribou, without a collared female in the group over the next ridge. We fly the area around 26B with two planes for a month. The herd is not moving. The lack of mosquitos and black flies probably plays a big part in the lack of migration and would also explain why they have seen caribou in Kuparak oil field in later months more now than ever in the past.

The best way to raise the herd numbers is to stop cow harvest. If this cannot happen for subsistence reasons then shorten the season even more than suggested by ADF&G or simply allow the cow harvest within the area of Native Alaskan villages for the residents only, with smaller bag limits and shorter seasons. I prefer none of my clients harvest a cow. This season many did. I have 30 cows out of the 116 Caribou harvested on my transporter activity reports for the 2016 season. 21 of these cows were taken by Alaskan Residents. It is hard to demand clients do not harvest a cow when it is in the Alaska Hunting Regulations book as allowable. We make sure each group has a regulations book in the field with them. This proposed change is long overdue and welcome.

This year ADF&G raised the fee for the Non-Resident licenses and tags, most non-resident hunters will only purchase one at the new rate of \$650.00 per tag. Some clients have already cancelled due to price increases.

Shorting the season to the suggested amount of two weeks at the end of August will put a hardship on all who come to Alaska for a "Once in a Lifetime Hunt". Families come and hunt for vacation. Children and teachers will not be able to attend at all. These hunters have booked the hunts a year or two in advance. It is not easy and very expensive to cancel/change the reservations at this late date; some will not be able to change due to work, children, or other responsibilities.

Yes, this would be a devastating blow to my business as well. I pride myself on being conscientious about the way my clients are prepared before they go into the field. I require each hunter to go through an orientation of what it means to leave no trace, being in bear country, what is expected when harvesting, etc. If clients have harvested, they do not have to stay in the field the rest of the scheduled trip. They call and we get them out within a day or two. If they choose to stay and it warms up, they have been instructed before the trip to bring the things needed to keep the meat cool by submerging it in the lake.

I support the effort to increase the herd. I do feel that predator control should come into play concerning the herd numbers but, decreasing the bag limit is a much better way to achieve the increase than to reduce the season to the end of August. The target being the hunter still has recreational days in the field. I propose the season run from August 1 - September 7 as the new decreased season. If you add the numbers on the Transporter Activity Reports for the outfitters that operate in the area, the decrease of bag limits and increase in prices of tags should reach the goal of 250-300 caribou unharvested for the season by non-residents alone. When you add in the ADF&G proposed changes to the Cow harvest and decreased resident bag limits to 5 caribou (instead of 5 per day) the unharvested animals of the Central Arctic Caribou herd should greatly surpass the goal set by ADF&G.



Submitted By
Chad
Submitted On
2/3/2017 9:56:25 AM
Affiliation
non-resident hunters

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412 691 7378
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ctoath@nobelclad.com
Address
121 Washington Dr
Fayette City, Pennsylvania 15438

To Whom It May Concern,

I am writing this letter in objection to Proposal 105, - possible changes to the 2017 caribou season. I am an avid hunter from Pennsylvania, and for many years the idea of experiencing an Alaskan hunt has been a dream. Last year, after years of saving both money and vacation time, I booked a drop off plane hunt for the last two weeks in August for caribou. I purchased my license and locking tags, and booked my flights, rental vehicles and more. While I understand the need for the ADF&G to responsibly manage the wildlife of Alaska, I hope you will also consider the timing and effort that go into planning a trip to your beautiful state. If the need to change regulations is real, I would hope it could be enacted far enough in advance to avoid the large financial loses that those of us trying to come to AK stand to incur. My hunting partner and I booked our trip a year in advance. Many hunters are booking even 2 years out! Most of the money I have invested in this trip, that took years to save, is non-refundable. The change in season dates alone will make my Air-Taxi and flights from PA to AK invalid and cost me at least \$4,000. Finally I'd like to note that the proposal states that the cost of the change is \$0. I believe this to be a complete falsehood. The ADF&G will lose over \$600 in revenue from every caribou tag you do not sell. While I am unsure of how many nonresident caribou tags are sold annually, the math is evident that the revenue ADF&G uses to support their ability to responsibly manage the wildlife of Alaska will in fact be effected by a reduction in the nonresident tags being offered. I felt it was unfair of the proposal author to imply that the cost to both nonresident hunters already booked for trips and to the ADF&G was nothing.

Thank you for your time in considering my objection to the proposed caribou season and limit changes,

Regards,

Chad Toth



Submitted By
Wade VanGinkel
Submitted On
2/3/2017 4:45:11 AM
Affiliation
hunting client

Hello, My name is Wade VanGinkel and I've just been informed by my transporter of the proposed changes for this season. As listed this would be disasterous for my son and I. I understand sound herd management but the changes are last minute.

We've saved over 2 years for this trip. Our tags, plane tickets and truck rental have already been purchased and nearly all is non refundable or unable to change the dates. Our group of 3 would be out nearly 10 thousand dollars which would weigh heavily on ever planning another trip.

Please consider our situatiuon and I'm sure many others like me in making your decision.

Thank You for your time,

Wade VanGinkel



Submitted By
Nathan vowels
Submitted On
2/3/2017 2:08:22 PM
Affiliation

Phone
2086608098

Email
Nathanspainting@gmail.com

Address
1120 gold hill road Princeton idaho
Princeton , Idaho 83857

Thank you for the update. I have booked a trip with 3 of my best friends with arrow Head outfitter. We have already purchased our tags and paid for half the hunt. It has always been a dream of ours to hunt caribou in your great state. I have always enjoyed wildlife and understand how difficult it can be to manage herds. If the state decides to only let us harvest 1 caribou each I would appreciate my refund for the second tag that I have already purchased. I am opened for other fair solution that you may have. No one cares more about the wildlife than a hunter, best of luck to you all on coming to an agreement on these tuff decisions that you are forced to make. Sincerely
Nathan Vowels CEO of the great Nathan's painting



Submitted By
Tony Wihlm
Submitted On
2/3/2017 12:51:50 PM
Affiliation

To whom this may concern,

I am a non-resident hunter that has scheduled a Caribou hunt with Arrowhead Outfitters this past Fall. I have reviewed the proposals and have some concerns with the limited opportunities for non-residents. The bag limit reductions are warranted based on the research by the ADF&G. I would request that bag limits be reduced for non-residents from 5 to 2 harvest tags to preserve the herds. At least preserve the harvest tags that have already been purchased by non-resident hunters prior to these proposals.

Non-resident hunters need to plan out complicated logistics to hunt in Alaska and this takes time. These plans for 2017 have already been done or materially started. The shortened open season for non-residents is much too short to have these plans changed at this time for 2017 in my humble opinion. A request is to make open season for non-residents at least a manageable length of time to adequately plan a quality trip to Alaska for non-residents.

Your proposals may be warranted to protect the herd but please consider the severity of the changes and moderate the changes to preserve a healthy non-resident hunt and keep people coming to Alaska.

Thank you for your time.



Submitted By
Mark Wilson
Submitted On
2/3/2017 4:54:35 PM
Affiliation
non-resident caribou hunter

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6053812064

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chromeriderRN@yahoo.com

Address
P.O. Box 7
370 West Feeney Avenue
Claire City, South Dakota 57224

SUBJECT: Opposition to last-minute changes to the 2017 Caribou hunting in unit 26B through Proposal 105.

Dear members of the Alaska Game and Fish board. I would like to first thank you for the job you do in managing the wildlife of Alaska. I am a non-resident hunter who has booked a drop caribou hunting trip for unit 26B in late August of 2017. This trip was booked last year, and I have already purchased two caribou tags and all required hunting licenses for such hunt from the state of Alaska, as have the three other non-resident hunters that will be in my group. First let me state that I fully understand and support the need for sudden last minute changes to regulations if there is a dire unforeseen circumstance that threatens the stability and future of a herd. In South Dakota we occasionally face this with isolated hemorrhagic fever outbreaks that suddenly and unexpectedly drastically reduce a whitetail deer herd in a certain area. However, from what I know that does not seem to be the case for the proposed last minute caribou hunting rule changes in unit 26B for the 2017 season. Rather the proposal seems to be one of long term herd management objectives and ultimate caribou population numbers.

I am asking you to consider some information that I will share in reaching your ultimate decision before you vote on Proposal 105. This hunt is now only six months away. The booking of these hunts occurs a year to two years in advance. Outfitters and the areas they serve are chosen by hunters due to known regulations. For non-residents to choose to hunt Alaska and invest countless thousands of their dollars on a hunt there must be a sense of some certainty and an expectation that at the last moment the rules will not suddenly be changed unless a dire unforeseen emergency situation requires such change. As I said, all in my group have already purchased and received two caribou tags per person for our 2017 drop hunt in unit 26B, which is where we are already legally contracted to be dropped. In addition to the possible loss of the ability to harvest a second caribou each, it also means that passing proposal 105 will mean that our group was sold four 2017 caribou tags by the state of Alaska that we will now not be able to use. And to the best of my knowledge there is no process to return these tags and receive a refund from the state. Although at this late stage in the game, only six months prior to our hunt, that would be the fair, and appropriate, thing to do if proposal 105 is passed and we are restricted to one caribou per hunter by the state of Alaska. As a non-resident hunter I would also like to point out that this comes on top of the recent doubling of non-resident hunting fees and tags that went in to effect January 1, 2017. If it is the desire of the state to discourage, or decrease, non-resident hunting in Alaska the passing of proposal 105 for the 2017 season at this late date and in conjunction with the recent sudden doubling in non-resident licensure cost will surely go a long way to achieving that goal. The shortening of the non-resident season will also make it much harder for many to visit and hunt Alaska, and severely restrict and harm Alaskan outfitters as only so many hunters can be accommodated in any given period. I know that the passing of proposal 105 at this late date will receive very unfavorable comments and opinion on the hunting forums and in the hunting community. And the end result of that is ultimately the resulting loss of massive tourism dollars, loss of massive income to Alaskans involved in the hunting industry, and loss of massive funding to Alaska Game and Fish through dramatically decreased future non-resident license and non-resident tag sales. Alaska is a great hunting destination, but there are many great hunting destinations in the world competing for the business and revenue hunters bring. It takes that revenue to properly fund the department and to properly manage Alaska's huge wildlife resource. Whether I shoot one or two caribou this season is insignificant to the potential damage and long term negative financial effects that passing proposal 105, at this time, could have on the future of revenue from non-resident hunters.

I thank you for allowing me to comment. And I am certain that you will reach a decision that you deem to be in the best interest of Alaska's wildlife. Thank you for your time and consideration.

Sincerely, Mark C. Wilson



Submitted By
Aaron wittmer
Submitted On
2/3/2017 12:48:25 PM
Affiliation

Phone
4069450566
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Witt1492@yahoo.com
Address
523 6th ave
Havre, Montana 59501

I am against this last minute change to hunting regulations for the 2017 Alaskan caribou hunts. I have been planning my hunting trip to Alaska for the last two years. This new season directly affects me because my group is scheduled to hunt August 9-15, 2017. If you change the season it will have adverse effects on me and my group. We have paid for airfare, motel, vehicle rentals, outfitting and been granted time off from work. If I have to make changes to my plans, it may result in me getting a refund for my trip because other plans. If ten percent of guys like me can't make the trip because of changes to the season, that could be a huge economic impact to everyone involved. Along with cancelling my trip, I have purchased two tags for caribou; the trip is more or less paid for. As for the wasted game left by out-of-state or poor ethical hunters, I agree it angers me more than I can say. If I am unable to take two caribou, it would result in me not donating as much meat to Alaskan residents that rely on this meat. No one in our group is going to shoot more than two caribou and are not looking to shoot a cow. I hope you will consider how these concerns and other sportsman's concerns on changing these regulations so close to the upcoming hunting season. Thank you for your consideration in this matter. Aaron Wittmer



Submitted By
Mary Able
Submitted On
2/1/2017 3:09:54 PM
Affiliation
Mrs.

Phone
530-524-5755

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zzdogbob@gmail.com

Address
535-000 Little Valley Road
McArthur, California 96056-7633

Hello:

I wish to comment re Proposal 142 to create a buffer zone around Denali Park to protect wolves from hunting and trapping. This is an excellent idea and one that deserves to be implemented and enforced fully. In light of the fact that the wolf population in Denali has been depressed for some time, a buffer zone would protect the individuals that the Park has from being killed or maimed when they wander across Park boundaries....which they inevitably do. The Board should be aware of the ecological value of a healthy wolf population: 1) wolves serve a valuable service in regulating the populations of ungulates. Ungulates, if overpopulated, will overgraze and/or overbrowse vegetation. 2) Wolves provide an incredible draw for tourism, which bring in major sums of money both to the Park, the State of Alaska, concessionaires in the areas of the Park. This includes both national and international tourism. My husband and I spent three weeks in AK a few years ago, and Denali and its wolves were a major reason for our visit. We go to Yellowstone NP at least once per year to see the wolves. It is very rare for anyone to be able to see wolves in a completely wild situation, and it bears no resemblance to viewing an animal in a zoo. Many more people are realizing this, and they want to experience seeing these animals in their natural habitat. 3) Addressing tourism a bit further, I would suggest that the Board review the revenues coming in from hunting and trapping fees versus the revenues generated by international and national tourism. 4) The Board should seek input from wolf and wildlife biologists to determine the scientific evidence confirming the importance of wildlife pathways in securing healthy populations of ALL wildlife, not only that of the wolves. Extending the protections afforded to wolves by the rules of Denali Park into a buffer zone would be a further help to preserving this species. I believe that it is the duty of the Board to conserve, and Proposal 142 would fall into that category.



Submitted By
Carol Allison
Submitted On
2/2/2017 2:33:35 PM
Affiliation

Phone
719 942 4221

Email
callison91968@gmail.com

Address
94 hwy. 69
Hillside, Colorado 81232

My daughter saw Denali wolves several years ago. I would go to Alaska to see them also, but I would not travel so far for any other reason. Colorado has its own beauty, but was not intelligent enough to protect its wolves and, sadly, has none. I hope Alaska will protect its wolves for all the people in the States who would love to get to see them. Carol Allison.



Submitted By
Arctic Audubon Society
Submitted On
2/2/2017 8:22:21 AM
Affiliation

Arctic Audubon believes wolves should be protected in GMU 2 adjacent to Denali National Park. Please pass Proposal 142. Thanks you.



Submitted By
David L Arnold
Submitted On
1/13/2017 12:24:12 PM
Affiliation

Phone
9076871767

Email
drdavidlamold@gmail.com

Address
P.O. Box 331
Denali Park, Alaska 99755

I support a ban on wolf hunting along the Denali National Park and Preserve boundary, and for the establishment of a buffer zone to protect those packs that reside within or migrate into the Park. I support the ban and buffer because our local tourism revenue, upon which this community depends, is directly tied to quality of experience for visitors. The fact that wolf sightings are down significantly over the past several years, I feel we should do our best to ensure survival of these packs in and immediately adjacent to the Park. There is plenty of land in Alaska to hunt wolves; we don't need to do so in a way where the wishes of the few far out-weight the needs of many, many others.
David L. Arnold



Submitted By
Thomas Avrutik
Submitted On
2/3/2017 9:46:02 AM
Affiliation

Please support Proposal 142

As a potential visitor to Denali, one of the main draws is the possibility to see wolves in their natural habitat. Establishing a no-hunting buffer around the park will help safeguard the wolves and maintain their natural habitat. We can draw on a map, but the wolves go where they will. We should make sure they are protected, not just for visitors like me, but for the benefit of all.

Thank you for your consideration.



To Whom It May Concern:

I am appalled and devastated to learn that the Alaska Wolf -East Fork Pack will inevitably vanish or has vanished due to legal hunting allowed by your board. How can you give these hunters the right to destroy these defenseless creatures who you know very well remain endangered? Can you not see that our children's children will never have the opportunity to see these majestic creatures alive again! It is not, as a human being your moral and ethical right to decide who or what to keep alive, it is not your right. I know the bottom line to all of this is money and those invisible strings being pulled that we the public may never see or know. Whatever your intentions please think what you have done to this species and many others not just now, but since the beginning of time. Do you understand the void and destruction you will cause not just for Alaska but for the world. What will your legacy be? Please stop this killing for the future of our children and our planet.

Thank you,
Evelynn Bajana



Submitted By
Susan Ballard
Submitted On
2/2/2017 8:50:48 PM
Affiliation
Ms

Phone
6082468505

Email
susaninwis@hotmail.com

Address
1101 Northport Drive
Madison, Wisconsin 53704

I support Proposal 142 to ensure a trapping/hunting free zone adjacent to Denali National Park. Please ensure that this safety zone is provided. I am particularly concerned about wolves and their safety in and near Denali.



Submitted By
Emilio Barrientos
Submitted On
2/2/2017 6:18:50 AM
Affiliation

To Whom It May Concern,

I am writing today in support of Proposal 142. I believe this proposal is vital to protecting the already vulnerable population of wolves in Denali National Park. It is important to maintain diverse animal populations in the park and for the regional and state economy. Please support Proposal 142.

Sincerely,

Emilio Barrientos



Submitted By
Robert Bedenkop
Submitted On
2/1/2017 4:08:27 AM
Affiliation

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6175415800

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rb.federal@verizon.net

Address
34 Garden Road
Wellesley, Massachusetts 02481

Our Family of four, traveled to Denali National Park this past summer from Boston,MA because of the intact, diverse animal populations we could find here and nowhere else. The importance of Denali's wolves to tourism can not be overstated. In addition to the revenue this adds to your states economy, please consider the importance of keeping what makes Alaska different from the rest of our country, a place where people can come and find intact natural ecosystems. Please remember Denali National Park is your states treasure.



Submitted By
Barbara Benisch
Submitted On
2/2/2017 9:08:29 AM
Affiliation

I am writing to urge your support of Proposal 142 to preclude hunting and trapping of wolves on distinct areas of state land adjacent to Denali National Park and Preserve, game management units 20A and 20C. As a visitor to Denali National Park I have had the awe-inspiring privilege to see a wolf. Nothing stirs the heart and soul more than seeing this regal, beautiful wild animal at home in the wilderness, untouched by human interference. With record low numbers of wolf populations, it was amazing that I was able to have that experience. We should do everything we can to ensure that the wolves can multiply so that more people can have the powerful and meaningful experience of seeing and hearing them. More importantly, we have a responsibility to keep Alaska as wild as possible so that there is at least one place in America where the animals are more important than people. Thank you for your consideration.



Submitted By
Maria Berger
Submitted On
1/31/2017 9:14:36 PM
Affiliation
Wildlife Biologist

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mariacharlie@alaska.net
Address
P.O. Box 81985
Fairbanks, Alaska 99708

To members of the Board of Game,

I urge you to support Proposal 142 to protect wolves in the former buffer zone known as the Stampede corridor (also called the wolf townships), adjacent to Denali National Park (DNP).

About half a million tourists visit DNP each year; wolves rank among the top wildlife species they hope to view. Not all of these tourists are "come-from-aways"; approximately 50,000 are Alaska residents.

Recognizing the importance of wolves to the ecosystem and tourists, the board of game (BOG) created the no-take buffer zone in 2002, helping conserve wolves that den in the park during summer and follow migrating prey beyond the park boundary in winter.

The buffer zone was allowed by BOG to sunset in 2010. Since then, numbers of tourists viewing wolves in DNP has declined from 45% to around 5%. One trapper in particular touts his ability to destroy viewing opportunities for hundreds of thousands of tourists (see National Geographic Magazine, February 2016 "How Can 6 Million Acres at Denali Still Not Be Enough?").

In a state with declining oil revenues, it seems unconscionable to support this situation. Governor Bill Walker spoke on "Alaska Live" on radio today (January 31, 2017) soliciting ideas for diversifying our economy and boosting tourism in the face of our recent economic woes.

By providing opportunities to view predators in their natural habitat, we can help the tourism sector of our economy remain healthy in this most visited National Park in Alaska.

The alternative is for tourists to get the message that if they want to see wildlife in all its complexities - predator and prey alike, they should visit Yellowstone National Park because such experiences are lacking in Alaska's "Crown Jewel of the North".

Sincerely,

Maria Berger

Wildlife Biologist

Naturalist Guide in Denali National Park, 1994-2013

Sent from my iPad



Submitted By
Hannah Berry
Submitted On
1/31/2017 6:52:26 PM
Affiliation

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907-209-2488

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akberry80@hotmail.com

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341 Miller Hill Rd
Fairbanks , Alaska 99709

I am deeply disturbed by how often the rights of our natural world are neglected, and have great fear as we move forward into the future. We, as people, hold a tremendous responsibility to protect the wild and all the creatures in it. Not for the mere sake of our own enjoyment, but for the respect and rights of all life. We hold the responsibility to assist the wolves of Denali in their survival. This means the support of all possible laws which aim to protect the wild animals of Alaska, and this nation. Alaska, above all, is a state indebted to its natural beauty, and should uphold these considerations. I was born in this beautiful state, and as someone representing the younger generation, I want say we must protect our home, and the homes of all creatures in Alaska. I support proposal 142, and I strongly urge you to do the same. Thank you for your consideration.



Submitted By
Davyd Betchkal
Submitted On
1/30/2017 2:32:03 PM
Affiliation

Hello Board of Game officials,

I live within the no-wolf-take zone described as part of Proposal 142 and I am in favor of enacting it. This proposal makes a lot of economic sense for us. You wouldn't believe the number of times I've heard people say "*oh, I'm headed to Denali,*" and I ask them, what do you want to do there? In the winter, they're coming here to see the northern lights. But in the summer, it's almost always, "*I want to see wildlife,*" and usually they're most excited to see wolves and bears. This Borough thrives on tourism dollars and I want to see a decision made by the Board of Game that benefits our local economy.

The experience of witnessing a wolf in the wild is a life-changing experience - I don't think I'll ever shed the memory of huge orange eyes looking right back into mine. But it's something I have done only once, despite spending more than 75 nights out in the backcountry areas around McKinley Village, the Yanert, and within the park over the last eight years. It is apparent from the research summarized in the proposal that about 11% of the wolves in eastern Denali packs were harvested in the Wolf Townships in 2015. At such a rate, I wonder how long they'll last. Therefore, I agree that if GMU 20A and 20C are within natural wintering ranges of these animals, they should be taken seriously for further protection. Encouraging take in this area seems far too impactful. I really don't want people to lose the chance to experience an amazing aspect of the place I live. And, selfishly, I want a second chance, myself.

Thanks for your time and public service. I recognize that these decisions are complex and take a considerable amount of effort to decide on. Please consider my local voice in your deliberations.

Davyd Betchkal



Submitted By
Julia Bevins
Submitted On
2/2/2017 5:18:17 PM
Affiliation

Phone
907-223-3483

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juliabevins@hotmail.com

Address
3303 Checkmate Dr
Anchorage, Alaska 99508

To the Alaska Board of Game,

I support proposal 142 that establishes a no hunting and trapping buffer adjacent to Denali National Park. One of my peak experiences with wildlife was a day in the park with a whole group of family and friends when a wild wolf trotted by, and experience that was priceless. Wolves belong in the park and because of their large home ranges and migratory routes, packs can be decimated by hunting and trapping close to the park borders.

Thank you,

Julia Bevins



Submitted By
Daniel Bissinger
Submitted On
2/2/2017 12:23:26 AM
Affiliation

Phone
3023835876
Email
danbissinger@gmail.com
Address
1548 Summit View Street
Anchorage, Alaska 99504

Alaska BOG:

Thank you for considering my comment on this important subject.

Studies conducted by eminent biologists (Murie, Haber, Mech, Ripple and countless others, I'm sure) have shown that wolves have inhabited Denali National Park and interior Alaska for at least a thousand years. The work of a handful of hunters, trappers and predator control programs have dismantled the right for wolves to live, and park visitors to view them in their natural habitat, in a matter of decades. In doing so, we as a people have demonstrated our ability to dominate the wilderness instead of live in it.

Not only have we surrendered our synergy with wilderness, but we have also surrendered the "Wilderness Idea" as Wallace Stegner put it. This is the idea that human beings can live with other creatures without destroying them, that we can assign value to wilderness beyond their economic uses, that we as people benefit from wilderness even if for ten years we never set foot in it, simply because it is there, for the sanity it brings and knowledge that there is still perhaps something left untamed on Earth. We need wilderness as much as wilderness needs us, and we cannot have wilderness in parts. It exists only in whole with minimal human disturbance. When one species is eradicated, the entire ecosystem is imbalanced.

Trophic cascade is highly pertinent to ecosystems inhabited by wolves; the studies conducted in Yellowstone over the past 15 years have demonstrated this. They show us that animals are best managed by themselves, devoid of human involvement and most especially devoid of archaic predator control programs that were invalidated as effective strategies several decades ago. There is no scientific basis for contemporary wolf control programs. Studies have shown, for example, ("The Case Against Wolf and Bear Control In Alaska" Haber, 2006) that wolves have negligible effects on moose, caribou, and sheep populations in Alaska and most often prey on the weakest animals -- half the time not hunting but scavenging on carcasses from animals aged, diseased, or weakened by harsh winters. There are high biological, scientific, and ethical costs of killing wolves (Ibid.). By establishing a no hunting/trapping buffer adjacent to Denali National Park where wolves often travel and den, wolves can better serve the ecosystems they are entitled to inhabit, park visitors can enjoy them, and the 'Wilderness Idea' may be upheld. Alaskans can do better.

We can live with wolves, enjoy them, and respect ourselves and appreciate life more fully. We can do this simply because of the knowledge that wolves exist and that we had a choice to exterminate them, again, and didn't.

Thank you for taking the time to read my comment.



Submitted By
Harry Blair
Submitted On
2/2/2017 12:07:08 PM
Affiliation
Alaska Tours, Anchorage

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admin@alaskatours.com
anchorage, Alaska 99501

The Alaska Board of Game PLEASE support Proposal 142 to establish a no hunting/trapping buffer adjacent to Denali National Park >> <http://bit.ly/1ljiDGi> Gone forever. World-famous wolf family of Denali National Park taken for trophy to satisfy a few. Wolf populations have been in decline at Denali for the last six years, but restoring wildlife conservation easement in one key region can help these majestic animals rebound.

URGENT: Deadline to take action is TODAY: Ask The Alaska Board of Game to support Proposal 142 to establish a no hunting/trapping buffer adjacent to Denali National Park >> <http://bit.ly/1ljiDGi>



During my first visit to Yellowstone I had the pleasure of watching the Lamar Valley wolf pack wake up one morning from my car parked by NPS employee on a ridge overlooking the valley. That morning will remain with me the rest of my life.

I am sure all of you know the story of how Yellowstone became a "cow pasture" (my definition) when wolves were eliminated. Once returned they kept the elk and bison from living on the stream banks and willow trees and other vegetation were able to return followed quickly by other wildlife (beaver, mink, fish, etc) that had disappeared due to no stream bank vegetation.

I am reading where I will no longer have a realistic chance to see a Denali wolf. I hope you will make every effort to keep Denali National Park from becoming a "cow pasture" and support a healthy Denali which means a healthy wolf population.

Sam Booher



Submitted By
Gary Borenstein
Submitted On
2/2/2017 7:18:46 PM
Affiliation

Phone
907-570-2974

Email
gaboren99@gmail.com

Address
P.O. Box 51
Denali Park, Alaska 99755

I would like to lend my support to proposal 142. I have worked in the Denali area for 38 years, and have lived there year round for the last 19 years. More importantly I have been a bus driver in Denali for the past 22 summers, driving over 1000 hours per summer, and know the dynamic of the park as well as anyone. There is no doubt that I have witnessed a precipitous decline in wolf viewings for the last four years. As in one or two sightings per summer recently. It is obvious to me that the wolves need to have protected status adjoining the National Park on state lands back to where it used to be not so long ago.

I urge you to do the right thing and pass proposal 142. Thank you for your consideration.

Sincerely...Gary Borenstein