

**PC 501****Name:** Rydalch, Dillon**Community of Residence:** Grantsville, Utah**Submission Time:** 1/6/2024 4:47:43 AM**Comment:**

Proposal #3

My name is Dillon Rydalch. I am from Utah and I have family that lives in Fairbanks Alaska. This issue directly affects me. I oppose proposal #3. I highly doubt that nonresident hunters have anything to do with population decline in the western arctic caribou herd. Climate, predation, residents killing cow caribou, and the natural ebb and flows of nature are more likely the cause. Nonresidents generally kill mature bulls that has zero effect on population number decline. Residents who are allowed to kill cows are killing generations of caribou. Wolves, bears and weather kill more caribou than anything. Do not punish nonresidents, who are not even remotely the cause of population declines, and who also pay a good chunk of money to hunt in Alaska. Why would the state want to lose out on all that funding? As if the hunting community wasn't under enough attack by non hunters, state regulations want to drive out nonresident hunters who are on the same team and are responsible for most state wildlife funding. Let nonresidents hunt Alaska and keep the hunting way of life alive for everyone. We all need to band together!

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

Proposal 3: Oppose

**PC 502****Name:** Safari Club International**Community of Residence:** Washington, DC**Submission Time:** 1/12/2024 11:43:45 PM**Comment:**

Please see attached comments for Safari Club International.



January 12, 2024

Via [arcgis.com](https://arcgis.com)

Alaska Board of Game  
Attn.: Proposal 3  
P.O. Box 115526  
Juneau, AK 99811-5526

**Re: Safari Club International Comments on the Proposed Regulation Change,  
Proposal 3 – 5 AAC 85.025, Hunting Seasons and Bag Limits for Caribou for  
the Alaska Board of Game**

Dear Alaska Board of Game,

Safari Club International (“SCI”) appreciates the opportunity to comment on Proposal 3. Proposal 3 would close the nonresident caribou season in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A. This would eliminate all nonresident hunting opportunities for caribou in the Units listed above.

SCI supports science-based management of wildlife. Alaska Department of Fish and Game (“ADFG”) data indicate that the Western Arctic Caribou Herd (“WACH”) has declined. The WACH provides caribou hunting opportunities in the listed Units. If the WACH can no longer support regulated harvest, then SCI does not oppose a reduction or closure of hunting opportunities. This would be an appropriate exercise of the Alaska Board of Game’s (“Board”) statutory responsibility to regulate hunting “as needed for the conservation, development, and utilization of game.” AS § 16.05.255.

However, SCI urges the Board to include in their discussions the important contributions of nonresident hunting to wildlife management in Alaska. SCI requests that the Board carefully consider whether barring all nonresident harvest across the listed Units is necessary to protect the resource or whether a compromise may be made with a more equitable solution that preserves some nonresident harvest.

**Safari Club International**

Safari Club International, an I.R.C. § 501(c)(4) nonprofit organization, has approximately 75,000 members and advocates worldwide. SCI has approximately 1,000 members and two chapters in Alaska. The Alaska SCI Chapter is the largest across SCI’s chapter network. Many SCI

members are professional hunters and guides in Alaska, whose livelihoods may be affected by this proposed closure. Moreover, many nonresident SCI members visit Alaska to enjoy its beautiful habitat, abundant wildlife, and unique hunting opportunities.

### SCI Comments on Proposal 3

The Western Arctic Caribou Herd Working Group (“Working Group”) submitted Proposal 3 to close the nonresident caribou season in the listed Units. The Working Group has also proposed to reduce resident hunting of the WACH (Proposal 2). The Working Group has estimated that the WACH has declined in number since its peak in the early 2000s of approximately 500,000 caribou.<sup>1</sup> At its annual meeting, the Working Group assigned the management level “Preservative, Declining” to the herd based on the current population census and adult cow survival rate, which was estimated at less than 80%.<sup>2</sup> The “Preservative, Declining” management level recommends a harvest of somewhere between 6,000 and 10,000 caribou per year.<sup>3</sup> At this “Preservative” management level, the 2019 Cooperative Management Plan for the WACH recommends: “1. No harvest of calves. 2. Limit harvest of cows by resident hunters through permit hunts and/or village quotas. 3. Limit the subsistence harvest of bulls to maintain at least 30 bulls: 100 cows. 4. Harvest restricted to residents only, according to state and federal law. Closure of some federal public lands to non-qualified users may be necessary.”<sup>4</sup>

SCI supports science-based management and “wise use” of resources to conserve them for future generations. If the WACH has declined such that harvest must be restricted, then SCI would support a decision to restrict harvest. But SCI cannot currently take a position on Proposal 3. It is not clear that *this* decision, to restrict nonresident harvest, is necessary for conservation of the WACH, or appropriate for wildlife management in Alaska.

Nonresident harvest has little biological impact on the WACH. Since 1996, WACH harvest estimates indicate that resident harvest accounts for approximately 95% of total harvest with nonresident hunters taking the remaining 5%.<sup>5</sup> Most of the nonresident harvest occurs in Units

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<sup>1</sup> Alaska Department of Fish and Game, Staff Comments for Proposals 3, 5, 15, 20, 23, 25, and 36-38, Western Arctic/Western Region Proposals, p. 7, [https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2023-2024/waw/dfg-comments\\_12-21-23.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2023-2024/waw/dfg-comments_12-21-23.pdf). (“ADFG Comments”).

<sup>2</sup> Working Group, DRAFT – 2022 Meeting Summary, December 14-15, 2022, p. 5, <https://westernarcticcaribou.net/wp-content/uploads/2023/02/2022-WACH-WG-Meeting-Summary-DRAFT-for-WACHWG-approval-at-2023-2.14.2023.pdf>.

<sup>3</sup> *Id.* at 2.

<sup>4</sup> Working Group, Western Arctic Caribou Herd Cooperative Management Plan, Revised 2019, Table 2, p. 26, [https://www.adfg.alaska.gov/static/research/plans/pdfs/wah\\_management\\_plan\\_final\\_2019.pdf](https://www.adfg.alaska.gov/static/research/plans/pdfs/wah_management_plan_final_2019.pdf).

<sup>5</sup> ADFG Comments, p. 3.

23 and 26A.<sup>6</sup> Annual nonresident harvest from 2012 to 2022 averaged 251 caribou and has been comprised almost exclusively of bulls (97.91%).<sup>7</sup> “The limited number of bulls harvested by nonresidents is believed to be biologically insignificant.”<sup>8</sup> The health and growth of a caribou population is largely driven by the number and ratio of cows. Since almost 98% of nonresident harvest is limited to bulls, it does not appear that prohibiting this hunting opportunity would preserve or conserve the WACH—except to the limited extent of reducing the annual harvest by 251 caribou.

At the same time, barring this nonresident hunting opportunity could have significant detrimental consequences for wildlife management in Alaska. Nonresident hunting contributes significant funding and support for achieving management objectives to the State’s wildlife conservation programs. Nonresident fees compromise over 70% of conservation funding in Alaska. As one example, in 2021, residents paid \$2,866,737 for hunting licenses and tags; nonresidents spent \$11,836,630. Nonresident licenses and tags generated more than four times the revenue of resident license and tags, despite representing only 12% of license sales.<sup>9</sup>

When this revenue is matched by federal Pittman-Robertson Wildlife Restoration funds at a three-to-one ratio, nonresident fees make a huge impact. In 2022, the federal match exceeded \$44 million.<sup>10</sup> These monies are used for wildlife management, habitat improvement, research, and other programs administered by the ADFG.<sup>11</sup> Without this conservation funding from nonresident hunters, Alaska may have to significantly reduce its conservation and management programs or increase license and tag fees for resident hunters.

Beyond the wildlife authority monies, nonresident hunters bring additional income to local communities. Money is generated through providing guide services, transport services, hotels, food, and meat processing, among other things. When meat is not taken home by nonresidents, it

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<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 4.

<sup>9</sup> ADFG, 2021 Calendar Year Licenses and Tags Issued, [https://www.adfg.alaska.gov/static/license/pdfs/licenses\\_stamps\\_tags\\_issued\\_2021.pdf](https://www.adfg.alaska.gov/static/license/pdfs/licenses_stamps_tags_issued_2021.pdf).

<sup>10</sup> U.S. Fish and Wildlife Service, Final Apportionment of Pittman-Robertson Wildlife Restoration Funds for Fiscal Year 2022, [https://www.fws.gov/sites/default/files/documents/WR%20FY22%20Certificate%20of%20Final%20Apportionment%202022Feb3\\_508.pdf](https://www.fws.gov/sites/default/files/documents/WR%20FY22%20Certificate%20of%20Final%20Apportionment%202022Feb3_508.pdf).

<sup>11</sup> See Div. of Wildlife Conservation Budget 2017-2019 (showing allocation of Pittman-Robertson funds), <https://www.adfg.alaska.gov/index.cfm?adfg=divisions.wcbudgetcorefunding171819>; Div. of Wildlife Conservation Budget 2020-2021, <https://www.adfg.alaska.gov/index.cfm?adfg=divisions.wcbudgetcorefunding202122>.



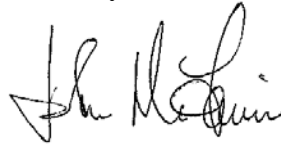
is donated to the local community.<sup>12</sup> Accordingly, the potential detrimental impacts of adopting Proposal 3 might outweigh the nominal conservation benefits (if any) of adopting it.

For these reasons, SCI requests that the Board carefully consider whether barring all nonresident harvest in the listed Units is necessary to conserve the resource, or is there an equitable solution that preserves some nonresident harvest of bull caribou.

## Conclusion

Thank you again for the opportunity to comment on this important proposal. If you have any questions, please contact Madie Demaske or Regina Lennox at [litigation@safariclub.org](mailto:litigation@safariclub.org).

Sincerely,



John McLaurin  
President, Safari Club International

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<sup>12</sup> Notably the Alaska Native Medical Center relies on hunted and gathered foods for its inpatient food service program. They accept most wild game meat and bones. *See* <https://anmc.org/donating-traditional-foods-for-anmc-patients/>. The Food Bank of Alaska welcomes gifts of caribou, moose, deer, and sheep meat. Food Bank of Alaska pays for meat to be processed and distributed to hungry families. *See* <https://foodbankofalaska.org/ways-to-give/give-food/#:~:text=Help%20Meat%20the%20Need&text=Hunters%20who%20would%20like%20to,%2C%20907%2D222%2D3115>.



PC 503

**Name:** Safari Club International

**Community of Residence:** Washington, DC

**Submission Time:** 1/12/2024 11:44:51 PM

**Comment:**

Please see attached comments for Safari Club International.

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January 12, 2024

Via [arcgis.com](https://arcgis.com)

Alaska Board of Game  
Attn.: Proposal 2  
P.O. Box 115526  
Juneau, AK 99811-5526

**Re: Safari Club International Comments on the Proposed Regulation Change,  
Proposal 2 – 5 AAC 85.025, Hunting Seasons and Bag Limits for Caribou for  
the Alaska Board of Game**

Dear Alaska Board of Game,

Safari Club International (“SCI”) appreciates the opportunity to comment on Proposal 2. Proposal 2 would reduce the bag limit for taking caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A to four caribou per year, only one of which may be a cow.

SCI supports science-based management of wildlife. Alaska Department of Fish and Game (“ADFG”) data shows that the Western Arctic Caribou Herd (“WACH”) has declined (not due to hunting, but likely due to weather and predation). The WACH provides caribou hunting opportunities in the listed Units. If the WACH can no longer support regulated harvest, even if hunting is not a cause of the decline, then SCI supports a reduction or closure of hunting opportunities. This would be an appropriate exercise of the Alaska Board of Game’s (“Board”) statutory responsibility to regulate hunting “as needed for the conservation, development, and utilization of game.” AS § 16.05.255.

**Safari Club International**

Safari Club International, an I.R.C. § 501(c)(4) nonprofit organization, has approximately 75,000 members and advocates worldwide. SCI has approximately 1,000 members and two chapters in Alaska. The Alaska SCI Chapter is the largest across SCI’s chapter network. Many SCI members are professional hunters and guides in Alaska, whose livelihoods may be affected by this proposed closure. Moreover, many nonresident SCI members visit Alaska to enjoy its beautiful habitat, abundant wildlife, and unique hunting opportunities.

## SCI Comments on Proposal 2

The Western Arctic Caribou Herd Working Group (“Working Group”) submitted Proposal 2 to reduce the bag limit for caribou in the listed Units. The Working Group has also proposed to close nonresident hunting of the WACH (Proposal 3). The Working Group has estimated that the WACH has declined in number since its peak in the early 2000s of approximately 500,000 caribou. During the 2022 census, ADFG estimated that the WACH had declined to 164,000 caribou.<sup>1</sup> At its annual meeting, the Working Group assigned the management level “Preservative, Declining” to the herd based on the current population census and adult cow survival rate, which was estimated at less than 80%.<sup>2</sup> The “Preservative, Declining” Management Level recommends a harvest of somewhere between 6,000 and 10,000 caribou per year.<sup>3</sup> At this “Preservative” management level, the 2019 Cooperative Management Plan for the WACH recommends the following management be considered: “1. No harvest of calves. 2. Limit harvest of cows by resident hunters through permit hunts and/or village quotas. 3. Limit the subsistence harvest of bulls to maintain at least 30 bulls: 100 cows. 4. Harvest restricted to residents only, according to state and federal law. Closure of some federal public lands to non-qualified users may be necessary.”<sup>4</sup>

SCI supports science-based management and “wise use” of resources to conserve them for future generations. Data indicate that the WACH has significantly declined, warranting harvest restrictions. SCI supports a decision to reduce bag limits and limit the harvest of cows if the herd cannot sustain current levels of harvest. SCI does not take lightly a decision that restricts the ability of its approximately 1,000 Alaskan members to harvest these caribou—particularly since it does not appear that hunting pressure has contributed to the reduction of the WACH. But if the Board finds that Proposal 2 is scientifically supported and will potentially help stabilize the WACH, then SCI would not oppose the proposal.

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<sup>1</sup> ADFG, Staff Comments for Proposals 1, 2, 26, and 34, Western Arctic/Western Region Proposals, p. 10, [https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2023-2024/waw/dfg-comments\\_1-9-24.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2023-2024/waw/dfg-comments_1-9-24.pdf).

<sup>2</sup> Working Group, DRAFT – 2022 Meeting Summary, December 14-15, 2022, p. 5, <https://westernarcticcaribou.net/wp-content/uploads/2023/02/2022-WACH-WG-Meeting-Summary-DRAFT-for-WACHWG-approval-at-2023-2.14.2023.pdf>.

<sup>3</sup> *Id.* at 2.

<sup>4</sup> Working Group, Western Arctic Caribou Herd Cooperative Management Plan, Revised 2019, Table 2, p. 26.

## **Conclusion**

Thank you again for the opportunity to comment on this important proposal. If you have any questions, please contact Madie Demaske or Regina Lennox at [litigation@safariclub.org](mailto:litigation@safariclub.org).

Sincerely,

A handwritten signature in black ink, appearing to read "John McLaurin". The signature is fluid and cursive, with the first name "John" and last name "McLaurin" clearly distinguishable.

John McLaurin  
President, Safari Club International



PC 504

**Name:** Safari Club International

**Community of Residence:** Washington, DC

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

**Comment:**

Please see attached comment for Safari Club International.

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January 12, 2024

Via [arcgis.com](http://arcgis.com)

Alaska Board of Game  
Attn.: Proposal 38  
P.O. Box 115526  
Juneau, AK 99811-5526

**Re: Safari Club International Comments on the Proposed Regulation Change,  
Proposal 38 – 5 AAC 85.025, Hunting Seasons and Bag Limits for Caribou  
for the Alaska Board of Game**

Dear Alaska Board of Game,

Safari Club International (“SCI”) appreciates the opportunity to comment on Proposal 38. Proposal 38 would close the nonresident caribou season in Unit 23. This would eliminate all nonresident hunting opportunities for caribou in Unit 23.

SCI supports science-based management of wildlife. Alaska Department of Fish and Game (“ADFG”) data indicate that the Western Arctic Caribou Herd (“WACH”) has declined. The WACH provides caribou hunting opportunities in Unit 23. If the WACH can no longer support regulated harvest, then SCI does not oppose a reduction or closure of hunting opportunities. This would be an appropriate exercise of the Alaska Board of Game’s (“Board”) statutory responsibility to regulate hunting “as needed for the conservation, development, and utilization of game.” AS § 16.05.255.

However, SCI urges the Board to include in their discussions the important contributions of nonresident hunting to wildlife management in Alaska. SCI requests that the Board carefully consider whether barring all nonresident harvest in Unit 23 is necessary to protect the resource or whether a compromise may be made with a more equitable solution that preserves some nonresident harvest.

**Safari Club International**

Safari Club International, an I.R.C. § 501(c)(4) nonprofit organization, has approximately 75,000 members and advocates worldwide. SCI has approximately 1,000 members and two chapters in Alaska. The Alaska SCI Chapter is the largest across SCI’s chapter network. Many SCI members are professional hunters and guides in Alaska, whose livelihoods may be affected by

this proposed closure. Moreover, many nonresident SCI members visit Alaska to enjoy its beautiful habitat, abundant wildlife, and unique hunting opportunities.

### SCI Comments on Proposal 38

The Northwest Arctic Regional Advisory Council (NWRAC”) submitted Proposal 38 to close the nonresident caribou season in Unit 23. The Western Arctic Caribou Herd Working Group (“Working Group”) has also proposed to close nonresident hunting (Proposal 3) and reduce resident hunting of the WACH (Proposal 2). The Working Group has estimated that the WACH has declined in number since its peak in the early 2000s of approximately 500,000 caribou. During the 2022 census, ADFG estimated that the WACH had declined to 164,000 caribou.<sup>1</sup> At its annual meeting, the Working Group assigned the management level “Preservative, Declining” to the herd based on the current population census and adult cow survival rate, which was estimated at less than 80%.<sup>2</sup> The “Preservative, Declining” management level recommends a harvest of somewhere between 6,000 and 10,000 caribou per year.<sup>3</sup> At this “Preservative” management level, the 2019 Cooperative Management Plan for the WACH recommends: “1. No harvest of calves. 2. Limit harvest of cows by resident hunters through permit hunts and/or village quotas. 3. Limit the subsistence harvest of bulls to maintain at least 30 bulls: 100 cows. 4. Harvest restricted to residents only, according to state and federal law. Closure of some federal public lands to non-qualified users may be necessary.”<sup>4</sup>

SCI supports science-based management and “wise use” of resources to conserve them for future generations. If the WACH has declined such that harvest must be restricted, then SCI would support a decision to restrict harvest. But SCI cannot currently take a position on Proposal 38. It is not clear that *this* decision, to restrict nonresident harvest, is necessary for conservation of the WACH, or appropriate for wildlife management in Alaska.

Nonresident harvest has little biological impact on the WACH. Since 1996, WACH harvest estimates indicate that resident harvest accounts for approximately 95% of total harvest with nonresident hunters taking the remaining 5%.<sup>5</sup> Annual nonresident harvest from 2012 to 2022

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<sup>1</sup> Alaska Department of Fish and Game, Staff Comments for Proposals 3, 5, 15, 20, 23, 25, and 36-38, Western Arctic/Western Region Proposals, p. 26, [https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2023-2024/waw/dfg-comments\\_12-21-23.pdf](https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2023-2024/waw/dfg-comments_12-21-23.pdf) . (“ADFG Comments”).

<sup>2</sup> Working Group, DRAFT – 2022 Meeting Summary, December 14-15, 2022, p. 5, <https://westernarcticcaribou.net/wp-content/uploads/2023/02/2022-WACH-WG-Meeting-Summary-DRAFT-for-WACHWG-approval-at-2023-2.14.2023.pdf>.

<sup>3</sup> *Id.* at 2.

<sup>4</sup> Working Group, Western Arctic Caribou Herd Cooperative Management Plan, Revised 2019, Table 2, p. 26, [https://www.adfg.alaska.gov/static/research/plans/pdfs/wah\\_management\\_plan\\_final\\_2019.pdf](https://www.adfg.alaska.gov/static/research/plans/pdfs/wah_management_plan_final_2019.pdf).

<sup>5</sup> ADFG Comments, p. 27.



averaged 182 caribou and has been comprised almost exclusively of bulls (97.82%).<sup>6</sup> “The limited number of bulls harvested by nonresidents is believed to be biologically insignificant.”<sup>7</sup> The health and growth of a caribou population is largely driven by the number and ratio of cows. Since almost 98% of nonresident harvest is limited to bulls, it does not appear that prohibiting this hunting opportunity would preserve or conserve the WACH—except to the limited extent of reducing the annual harvest by 182 caribou.

At the same time, barring this nonresident hunting opportunity could have significant detrimental consequences for wildlife management in Alaska. Nonresident hunting contributes significant funding and support for achieving management objectives to the State’s wildlife conservation programs. Nonresident fees compromise over 70% of conservation funding in Alaska. As one example, in 2021, residents paid \$2,866,737 for hunting licenses and tags; nonresidents spent \$11,836,630. Nonresident licenses and tags generated more than four times the revenue of resident license and tags, despite representing only 12% of license sales.<sup>8</sup>

When this revenue is matched by federal Pittman-Robertson Wildlife Restoration funds at a three-to-one ratio, nonresident fees make a huge impact. In 2022, the federal match exceeded \$44 million.<sup>9</sup> These monies are used for wildlife management, habitat improvement, research, and other programs administered by the ADFG.<sup>10</sup> Without this conservation funding from nonresident hunters, Alaska may have to significantly reduce its conservation and management programs or increase license and tag fees for resident hunters.

Beyond the wildlife authority monies, nonresident hunters bring additional income to local communities. Money is generated through providing guide services, transport services, hotels, food, and meat processing, among other things. When meat is not taken home by nonresidents, it

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<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> ADFG, 2021 Calendar Year Licenses and Tags Issued, [https://www.adfg.alaska.gov/static/license/pdfs/licenses\\_stamps\\_tags\\_issued\\_2021.pdf](https://www.adfg.alaska.gov/static/license/pdfs/licenses_stamps_tags_issued_2021.pdf).

<sup>9</sup> U.S. Fish and Wildlife Service, Final Apportionment of Pittman-Robertson Wildlife Restoration Funds for Fiscal Year 2022, [https://www.fws.gov/sites/default/files/documents/WR%20FY22%20Certificate%20of%20Final%20Apportionment%202022Feb3\\_508.pdf](https://www.fws.gov/sites/default/files/documents/WR%20FY22%20Certificate%20of%20Final%20Apportionment%202022Feb3_508.pdf).

<sup>10</sup> See Div. of Wildlife Conservation Budget 2017-2019 (showing allocation of Pittman-Robertson funds), <https://www.adfg.alaska.gov/index.cfm?adfg=divisions.wcbudgetcorefunding171819>; Div. of Wildlife Conservation Budget 2020-2021, <https://www.adfg.alaska.gov/index.cfm?adfg=divisions.wcbudgetcorefunding202122>.

is donated to the local community.<sup>11</sup> Accordingly, the potential detrimental impacts of adopting Proposal 3 might outweigh the nominal conservation benefits (if any) of adopting it.

For these reasons, SCI requests that the Board carefully consider whether barring all nonresident harvest in Unit 23 is necessary to conserve the resource, or is there an equitable solution that preserves some nonresident harvest of bull caribou.

## **Conclusion**

Thank you again for the opportunity to comment on this important proposal. If you have any questions, please contact Madie Demaske or Regina Lennox at [litigation@safariclub.org](mailto:litigation@safariclub.org).

Sincerely,



John McLaurin  
President, Safari Club International

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<sup>11</sup> Notably the Alaska Native Medical Center relies on hunted and gathered foods for its inpatient food service program. They accept most wild game meat and bones. *See* <https://anmc.org/donating-traditional-foods-for-anmc-patients/>. The Food Bank of Alaska welcomes gifts of caribou, moose, deer, and sheep meat. Food Bank of Alaska pays for meat to be processed and distributed to hungry families. *See* <https://foodbankofalaska.org/ways-to-give/give-food/#:~:text=Help%20Meat%20the%20Need&text=Hunters%20who%20would%20like%20to,%2C%20907%2D222%2D3115>.



PC 505

**Name:** Salem, Joe

**Community of Residence:** Valdez, AK

**Submission Time:** 1/10/2024 7:47:29 PM

**Comment:**

Please do not close Caribou to non-residents. The current impact of non-residents is insignificant.

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 506

**Name:** Sanders, Brad

**Community of Residence:** Washoe Valley, NV

**Submission Time:** 1/8/2024 10:43:26 PM

**Comment:**

Oppose #3 and #38

As someone who likes to hunt out of state, I know how much we can bring to communities as hunters. Similarly hunting as managed by the state for the benefit of the people of the state should be based on science and not political whims. Hunted populations need to be managed by the State, based on science and the most good for the most people for the longest time.

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

Proposal 3: Oppose

Proposal 38: Oppose

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**Name:** Sandstead, Eric

**Community of Residence:** Dayton

**Submission Time:** 1/13/2024 4:06:32 AM

**Comment:**

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

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

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

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

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

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

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

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

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

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

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 508

**Name:** Santens, Jean-Christophe

**Community of Residence:** Cincinnati, OH

**Submission Time:** 1/9/2024 11:44:00 PM

**Comment:**

Dear meeting members,

I oppose proposals #3 & #38 for the following reasons:

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

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

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

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

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

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

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

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

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

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

All other proposals on the agenda for this sitting of the Western Arctic / Western Region Meeting, receive my support.

Best regards,

J-C Santens



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

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PC 509

**Name:** Satterwhite, Andrew

**Community of Residence:** Ruther Glen, Virginia

**Submission Time:** 1/13/2024 2:10:10 AM

**Comment:**

As a federal wildlife biologist, avid outdoorsman and father of two young hunters I strongly oppose proposal 3 and 38. Hunting is crucial part of North American wildlife conservation and these go against the very foundation of wildlife management in the United States.

As a Virginia resident my federal tax dollars provide critical funding for these Alaska federal lands. I am honestly disheartened that such proposals would even be considered seriously.

Below you will find 10 reasons why limiting or removing non resident hunting in Alaska lacks merit and should be strongly opposed.

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

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

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

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

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

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

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

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

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

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

I appreciate your time and I hope these comments will help ensure my children and their children have the opportunity to travel to Alaska and enjoy the natural resources and continue the rich tradition of hunting in Alaska. I grew up reading books and magazines on caribou and Alaskan adventures, I am hopeful my children will have the same chance of chasing after that dream.

Respectfully,

Andrew Satterwhite

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

Proposal 3: Oppose

Proposal 38: Oppose

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**Name:** Scaplen, William

**Community of Residence:** Bryan, Texas

**Submission Time:** 12/30/2023 7:28:00 AM

**Comment:**

To Whom it May Concern,

I'm writing to you to voice my protest and concerns over proposal #3. The proposed ban on non-resident hunting is an extreme detriment to all hunters (resident & non-resident alike). A measure to help the WACH should look at resident hunters with their extreme liberal bag limits and lengthy season, whereas Non-Resident hunters were already impacted in 2015. A complete closure to non-resident hunters would take vital income away from the local areas as well as resources often utilized due to the traveling non-resident hunters. It would have an economic impact on businesses and the local community by removing hunting based tourism, tax revenue, and jobs created by the outfitters, air taxis/transporters, restaurants, hotels, taxidermists, and numerous other professions that see a boost during the fall hunting seasons. Regardless of the number of non-resident hunters the successful hunter number remains relatively constant due to the migratory nature of the WACH.

Closure of the non-resident caribou hunting would also be of further detriments since many non resident hunters also apply for bear tags in the area. The board should consider a measure that targets predator populations and provides over the counter bear tags, or a guaranteed bear tag allotment for hunters who purchase a caribou or moose tag in this area.

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**PC 511****Name:** Schaefer, Steve**Community of Residence:** Prescott, AZ**Submission Time:** 1/13/2024 3:50:52 AM**Comment:**

I oppose proposal 3 and proposal 38. The declining caribou population is very concerning, however I feel that eliminating non resident caribou hunting is not the solution to address this issue. A comprehensive approach that considers all factors including habitat loss, climate change, total harvest by subsistence hunters, resident hunters, and non resident hunters should be used to improve management practices to ensure long term herd sustainability.

Thanks for providing the opportunity to comment.

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

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

Proposal 36: Oppose Proposal 37:

**PC 512****Name:** Schmidt, Don**Community of Residence:** Norris MT**Submission Time:** 1/10/2024 11:36:30 AM**Comment:**

Oppose #3

Non-resident hunters have a minimal impact on the caribou population, primarily harvesting bulls, which are less critical to population growth compared to cows and calves and only equate to .1% of annual harvest

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

Proposal 3: Oppose

Proposal 38: Support



**Name:** Schoen, John

**Community of Residence:** Anchorage, AK

**Submission Time:** 1/6/2024 8:07:51 PM

**Comment:**

I was one of 34 biologist that submitted a commentary to the Anchorage Daily News on Aug 15, 2023 (see attached) objecting to ADF&G's kill of 94 brown bears in the range of the Mulchatna Caribou Herd last spring. There was weak scientific support for this control action. Further, the Mulchatna intensive management program has unrealistic population and harvest goal given the history of this herd. It is unlikely that the goal of maintaining a population of 30,000-80,000 caribou is achievable and bear control is unlikely to substantially increase caribou numbers given current nutrition, disease, and illegal harvest issues. Also, there is a lack of clear criteria for evaluating this intensive management program. for these reasons, I do not support Proposal 17 nor do I support the intensive management program for brown bears in the range of the Mulchatna Caribou Herd.

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

Proposal 17: Oppose

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Anchorage Daily News, August 15, 2023

## OPINION: Alaska's game management goals for Mulchatna caribou are unrealistic

By 34 retired Alaska wildlife scientists and managers

Updated: 1 hour agoPublished: 1 hour ago



Mulchatna caribou (Alaska Department of Fish and Game)

We are retired wildlife scientists and managers living in Alaska, with varied backgrounds in state, federal and university organizations. We value Alaska's hunting heritage and the importance of wildlife in providing a sustainable source of food and cultural values. We, and many Alaskans, also enjoy wildlife viewing and photography.

We were surprised and alarmed when we read about the Alaska Department of Fish and Game's Mulchatna predator control action where 94 brown bears, five black bears and five wolves were shot from a helicopter in Southwest Alaska this spring. After reviewing more details, including Fish and Game Commissioner Doug Vincent-Lang's commentary and the Mulchatna Intensive Management Operational Plan, we feel compelled to speak up.

In the mid-1970s, the Mulchatna caribou herd numbered about 14,000, comparable to today's herd, and was thought to have been low throughout the previous century. Beginning in the 1980s, the herd grew steadily to 200,000 animals by 1996, then rapidly declined to its current size, about 12,000. We know that caribou herds naturally go through significant fluctuations over time and that it can take many decades for forage resources to recover from overuse during population peaks.

Early calf mortality in recent years has fluctuated, but has been relatively low in many years and variable between east and west calving areas. Black and brown bears and wolves were the predominant predators. Other key factors affecting herd abundance include reported overgrazing, shrubs replacing lichens (a critical winter forage), variable weather, disease, and continuing human harvests despite hunting closures. Clearly, all these factors are in play for the Mulchatna herd, while rising temperatures increase future uncertainty for caribou. After reviewing Fish and Game's briefing to the Alaska Board of Game and the Mulchatna Intensive Management Plan, we do not believe the Mulchatna predator control decision was underpinned by the best available science, nor was it adequately vetted with the public prior to implementation.

Alaska's 1994 "Intensive Management" law established the harvesting of meat from Alaska's big game species as the management priority in most of the state. This law required the Board of Game to consider techniques for increasing game populations important for human consumption before adopting regulations that would reduce the harvest of these animals. Reducing predators has been the primary technique used to increase abundance of big game in Alaska, but Fish and Game has yet to show that it can effectively increase caribou populations when other factors are clearly influencing herd dynamics.

It appears to us that the Mulchatna predator control action was a top-down decision by Fish and Game leadership with unanimous support of the Board of Game to expand wolf control after 11 years, with no measurable effect, and to add bear control on one of two calving grounds. We recognize that both wolf and bear predation are factors in caribou calf mortality. However, Fish and Game staff scientists cautioned about the ineffectiveness of the past wolf control program. They also described nutritional limitations on adult cows, as well as a high incidence of the disease brucellosis, both of which affect reproduction and individual survival. Investigations of adult female mortality revealed that even though the hunting season has been closed since 2021, illegal harvest continues to affect the population. According to Fish and Game researchers, "Combined, these data point to nutritional challenges, disease, and human-related causes of death, as important and likely interacting with predation to limit the Mulchatna caribou herd recovery." Additionally, the Mulchatna Intensive Management Plan provided no data on bear densities in the predator control area, nor criteria for evaluating success of the intensive management program.

In summary, the 34 wildlife professionals who have signed this commentary, with more than 1,000 years of combined Alaska experience, conclude there is weak scientific support for the Mulchatna control action. The Mulchatna intensive management program has unrealistic population and harvest goals given the history of the herd. It is unlikely that the goal of maintaining a population of 30,000-80,000 caribou is achievable and bear control is unlikely to substantially increase caribou numbers given current nutrition, disease, and illegal harvest

issues. Finally, there is a lack of clear criteria for evaluating this intensive management program.

ADVERTISEMENT

We believe Alaska can do better.

*The authors are retired members of the listed organizations:*

***Julia Bevins***, University of Alaska Fairbanks, International Association for Bear Research and Management, Homer

***Geoff Carroll***, ADF&G, Utqiagvik

***Jim Dau***, ADF&G, Kotzebue

***Dirk Derksen***, Alaska Science Center, U.S. Geological Survey, Anchorage

***Rod Flynn***, ADF&G, Juneau

***Pat Heglund***, U.S. Fish and Wildlife Service, Homer

***Thomas Hanley***, U.S. Forest Service Research, Haines

***Polly Hessing***, ADF&G, Anchorage

***Mimi Hogan***, USFWS, Anchorage

***Jerry Hupp***, Alaska Science Center, USGS, Anchorage

***David Irons***, USFWS, Anchorage

***Matt Kirchhoff***, ADF&G, Anchorage

***Kathy Kuletz***, USFWS, Anchorage

***Rosa Meehan***, USFWS, Anchorage

***John Morton***, USFWS, Soldotna

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***Ed Murphy***, UAF, Fairbanks

***Jon Nickles***, USFWS, University of Alaska Anchorage, Anchorage

***Kate Persons***, ADF&G, Nome

**Ann Rappoport**, USFWS, Anchorage

**Harry Reynolds**, ADF&G, Fairbanks

**Pat Reynolds**, USFWS, Bureau of Land Management, Fairbanks

**Dan Rosenberg**, ADF&G, Anchorage

**Thomas Rothe**, ADF&G, Eagle River

**John Schoen**, ADF&G, Anchorage

**Dick Shideler**, ADF&G, Fairbanks

**Rick Sinnott**, ADF&G, Anchorage

**Winston Smith**, USFS Research, Juneau

**Don Spalinger**, ADF&G, UAA, Eagle River

**Derek Stonorov**, ADF&G, Homer

**Jerry Stroebele**, USFWS, Anchorage

**Nancy Tankersley**, ADF&G, USFWS, Anchorage

**Ken Whitten**, ADF&G, Fairbanks

**Mary Willson**, USFS Research, Juneau

**John Wright**, ADF&G, Fairbanks

*The views expressed here are the writer's and are not necessarily endorsed by the Anchorage Daily News, which welcomes a broad range of viewpoints. To submit a piece for consideration, email [commentary\(at\)adn.com](mailto:commentary(at)adn.com). Send submissions shorter than 200 words to [letters@adn.com](mailto:letters@adn.com) or [click here to submit via any web browser](#). Read our full guidelines for letters and commentaries [here](#).*



**Name:** Schoening, Delwyn

**Community of Residence:** Fallon

**Submission Time:** 1/3/2024 9:56:56 PM

**Comment:**

Are you kidding us? Some hunters can harvest five DAILY and you are worried about the NON resident hunters? The bureaucrats in charge of setting the bag limits of the PEOPLES resources should have to display some common sense when they attempt to do their jobs. How many subsistence caribou does one need? I am thinking that no one can eat that much so there must be some kind of bartering of the meat by locals?? A practice that is illegal anywhere else that I have ever hunted. Iowa did the same thing a few years back by pricing the non-residents out of affordable tags to harvest whitetail deer (while letting the locals take them (does) for one dollar each) and now the harvest is down and the deer kill and vehicle damage from highway interactions are way up. Again, a little COMMON sense goes a long way folks. TOURIST dollars help feed an economy and you are about to turn off the preverbal spigot on that. Great Job. An idea hatched by one of the newly college degreed idiots no doubt that is still wet behind the ears. Talk to your elders before you ruin your economy.

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Proposal 37: Support Proposal 38: Oppose Proposal 39: Oppose Proposal 40: Oppose Proposal  
41: Oppose Proposal 42: Oppose Proposal 190: Oppose Proposal 209: Oppose

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**Name:** Schomburg, Andrew

**Community of Residence:** Rocklin, CA

**Submission Time:** 1/11/2024 9:57:17 PM

**Comment:**

As a non-resident of Alaska and a hunter with aspirations to hunt caribou in Alaska, I am writing to voice my opposition to Proposal #3 and Proposal #38. I am opposed to both of these proposals for the following reasons:

1. These proposals most severely impact non-resident hunters, who are by far the group which kills the fewest number of caribou cows in this area. The crux of these proposals is increasing caribou populations, which hinges on adult cow survival. Non-resident harvest of cow caribou is negligible in these areas. Non-resident harvest of caribou in these areas averages 250 individuals per annum, and bulls are by far the most targeted and killed sex. In contrast, average subsistence kills of caribou in these areas ranges from 10,000 - 14,000 individuals, with a large proportion being cows and calves. From a purely numbers perspective, these proposals do not make sense and cannot be supported.

2. The precedent which these proposals set for future hunting opportunities could be incredibly damaging. The lack of scientific backing for the proposals and the apparent knee-jerk overreaction of banning non-resident hunters could spell economic and conservational disaster for many other species. This erosion of hunting opportunities would set a precedent for other states which are historically unfriendly to hunters to further limit their hunting opportunities on a whim with barely a modicum of scientific reasoning.

Without further research definitively linking non-resident hunting as a major contributor to the population of the Western Arctic Herd, it is irresponsible for the ADF&G to pass Proposal #3 and Proposal #38. Doing so would be a severe disservice for non-resident hunters, the Western Arctic Herd, and resident hunters alike.

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Proposal 3: Oppose

Proposal 38: Oppose

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PC 516

**Name:** Schultz, John

**Community of Residence:** Earleville MD

**Submission Time:** 1/6/2024 2:46:44 AM

**Comment:**

I strongly oppose proposal #3 as well as Proposal #38. NR hunters should not be excluded from acquiring Caribou tags.

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 517

**Name:** Schumacher, Tom

**Community of Residence:** Eielson AFB

**Submission Time:** 1/2/2024 7:32:22 AM

**Comment:**

Oppose 3

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

Proposal 3: Oppose

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PC 518

**Name:** Schuman, Fred

**Community of Residence:** Troy, MO

**Submission Time:** 1/9/2024 12:16:20 AM

**Comment:**

Hello,

I'm writing this on the behalf of hunters, current and future, concerned with proposal 3 and 38. The caribou herds' numbers fluctuate considerably for many reasons; weather, disease, lack of food due to weather, predators, to name the main culprits. The hunters have the least effect of all. The hunters only pursue for a season and are limited by tags. The other factors have no controls.

Hunters are the only true conservationist in the world. A majority of the wildlife folks enjoy are funded by hunters, period. Many folks are only preservationist, meaning they want no involvement or change due to human activity. Too late for that. The preservationists seem to apply their funds toward litigation, very little or none toward projects that would actually benefit wildlife.

The largest concern for hunters is giving an inch in the name of conservation, but being governed by preservationists to take a mile. What I mean is that hunters would be fine with limiting hunting for a scientific period of time, but if this happens as it has so many times in the past, the preservationists step in and make it permanent.

Hunters are struggling to trust the administration of wildlife agencies and their bosses. Too many of these administrative leaders are preservationists. Preservation is not an optimal form of wildlife. Humans have created such an unbalance that any kind of balance is unattainable without removing all humans from the equation, the earth. That won't happen!

These animals primarily only have value, because hunters have given them value. This wildlife is a renewable resource, similar to livestock in agriculture, but wildlife has no man made boundaries.

Please consider keeping these areas open and even opening other areas that have previously been closed if numbers are sustainable.

Thank you,

Fred Schuman



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Proposal 3: Oppose

Proposal 38: Oppose



PC 519

**Name:** Schwieters, Ryan

**Community of Residence:** Brainerd, Minnesota

**Submission Time:** 1/11/2024 3:14:38 PM

**Comment:**

Taking opportunities away from non-residents will have no effect on the caribou herds. Non residents shoot approximately 250 caribou per year. Almost all of which are bulls.

Annual subsistence harvest is between 10,000 and 14,000 animals, many of which are cows and calves which are important for maintaining and increasing herd numbers.

Removing opportunities from non residents will only congest other hunting areas, and will not change the herd population in any way.

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Proposal 3: Oppose

Proposal 38: Oppose

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PC 520

**Name:** Scillia, Anthony

**Community of Residence:** Dingmans ferry, Pennsylvania

**Submission Time:** 1/2/2024 11:51:45 PM

**Comment:**

Closing the caribou to non residents will close off people from getting a bucket list animal and also would hurt the stores on the dalton highway.

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PC 521

**Name:** Scofield, Adam

**Community of Residence:** Rapid city, SD

**Submission Time:** 1/6/2024 8:10:34 PM

**Comment:**

In regards to proposal #3 and #38.

I am an avid outdoorsman who enjoys new adventures each year. I have hunted many western states and have been saving up for the ultimate adventure, Alaska. My family and I have had our sights set on a caribou hunt in northwest Alaska for many years, this has been our ultimate goal. Many family members before us have embarked on this journey, it's now become tradition. If these proposals are approved this will end many nonresident traditions and will no longer allow

nonresidents to experience the beauty that Alaska has to offer. Please reconsider the decision to close nonresident hunting.

I understand from tag numbers perspective, if that's the case, nonresidents are willing to decrease the tags allocated but please don't close the units. Increase tag fees to help with caribou management.

Western states in the lower 48 do not CLOSE units to nonresidents, but they change the tag allocation as well as price. This is something that all of us nonresidents can Support. But, we cannot support the closure of hunting units for one of Americas most beautiful/remote animals.

I urge you all to please reconsider

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Proposal 3: Oppose

Proposal 38: Oppose

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**Name:** Scofield, Jake

**Community of Residence:** Burnsville Minnesota

**Submission Time:** 1/7/2024 12:07:14 AM

**Comment:**

I am a young male looking to have future opportunities to hunt in the great frontier of Alaska. Not only does this take away some of the species away from Americans. It is also the only place in America to hunt these amazing creatures and not only does Alaska get the income from nonresidents but it also stays in the United States rather than another country. Do not allow them to take away nonresidents hunting opportunities inside our own country.

Thank you,

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 522





PC 523

**Name:** Scofield, Kyle

**Community of Residence:** Butte, MY

**Submission Time:** 1/6/2024 8:52:50 PM

**Comment:**

Oppose proposal 3 and 38

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 524

**Name:** Scott, Kasey

**Community of Residence:** Hooper, Utah

**Submission Time:** 1/3/2024 2:54:28 AM

**Comment:**

As a non-resident and a hunter of your great state I strongly oppose the limitations to non-residents which I believe will have a monetary effect on the small communities. Please take this into consideration as you vote on this proposal.

Thanks,

Kasey Scott

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Proposal 24: Support Proposal 25: Oppose Proposal 26: Support Proposal 27: Support Proposal 28: Support Proposal 29: Support Proposal 30: Support Proposal 31: Support Proposal 32: Oppose Proposal 33: Oppose Proposal 34: Support Proposal 35: Support Proposal 36: Support Proposal 37: Support Proposal 38: Oppose Proposal 39: Oppose Proposal 40: Support Proposal 41: Support Proposal 42: Support

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PC 525

**Name:** Scott, Tyler

**Community of Residence:** Puyallup, WA

**Submission Time:** 1/9/2024 1:20:48 AM

**Comment:**

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

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

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

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

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

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

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

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

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

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

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 526

**Name:** Seamons, Josee

**Community of Residence:** Spanish Fork, Utah

**Submission Time:** 1/2/2024 5:57:45 AM

**Comment:**

I oppose proposal 3 as recommended.

Reducing/limiting harvest, especially female harvest is the sound thing to do in a declining ungulate population. Eliminating nonresident harvest is not going to have any impact on the population. Nonresidents are more likely to target older age class bulls and that harvest has no additive mortality effects on the population. The economic/monetary impacts to rural communities also benefits from nonresident hunters.

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

Proposal 3: Oppose

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PC 527

**Name:** Seeloff, Taylor

**Community of Residence:** Charlotte, North Carolina

**Submission Time:** 1/10/2024 6:51:48 PM

**Comment:**

Hello, I am writing on behalf of proposal #3 and proposal #38 to deny access to caribou hunting for non-resident hunters to the areas outlined in the current proposals. I have never been to Alaska but have always dreamed of making the trip, specifically to have a chance at hunting Caribou in the Western Arctic. Last year I reached out to a local hunting guide and was informed of the current, temporary ban on nonresident hunting in this area and more recently I read about the proposal to permanently ban this area to non resident hunters. While I understand and respect the concern for the current decline of this Caribou herd population, it seems that there is little to no evidence to support this being a result of hunting pressure of any kind (local or non local). I have done some research and I am quite confused at why this choice would be the first step in trying to rebuild this herd. I am not a wildlife professional but I do know that history has shown that hunters tend to be the biggest conservationist for the species in which they target resulting in some of the healthiest target animal populations throughout the US in its history. Furthermore, I have to imagine that the locals of this region depend on the spending from non-local hunters as income for their businesses and livelihood. Please strike down these proposals and consider other methods of conservation in helping to combat the decline of this Caribou herd, and allowing both locals and non locals to continue hunting access to a federal land which is rightfully all of ours.

Regards,

Taylor Seeloff

Charlotte, NC

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

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

Proposal 37: Support Proposal 38: Oppose Proposal 39: Support Proposal 40: Support Proposal 41: Support Proposal 42: Support Proposal 190: Support Proposal 209: Support

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PC 528

**Name:** Seetot, Carl

**Community of Residence:** Brevig Mission

**Submission Time:** 1/11/2024 7:47:29 AM

**Comment:**

My name is Carl Seetot. I was born and raised in north west Alaska. I've lived in Alaska my whole life. I am an Alaskan hunting guide. I do most of my guiding in 22d, some in 22e. I am against the proposal to stop non-residents from coming to 22D/E to caribou hunt. I believe that caribou populations naturally fluctuate. And I believe that's what we are seeing right now in the western arctic caribou herd. Guiding caribou is a good chunk of my income. If caribou guiding in that unit got shut down, I'd have to find some where else to guide to make up for that income. And one day, I'd like to be on my own guiding caribou out of the unit that I grew up in. It's been a dream of mine. If we could make grizzly bear tags, an over the counter tag for non residents, then we'd take some pressure off of the caribou population. And it would encourage more non resident hunters to come up and hunt grizzlies. There's other options rather than shutting down caribou guiding that is our livelihood. Not only my livelihood, but a bunch of other guides and their families that I know.

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

Proposal 22: Support Proposal 26: Support Proposal 27: Support

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PC 529

**Name:** Seibt, Blaise

**Community of Residence:** Alaska

**Submission Time:** 1/12/2024 3:24:24 PM

**Comment:**

Blaise Seibt

Greetings,

My name is Blaise Seibt and i oppose proposal #3. Having had the privelege of hunting with non resident hunters in unit 22 for the last couple years, i have seen the revenue and positive impacts these caribou hunters have had on the local towns and villages. I have also observed the very minimal impact these non resident hunters have had on the caribou herds, with the conservative bag limit of one bull caribou. When compared to the numbers/ figures of what local residents harvest( from snow machines), it really shows how miniscule a impact non residents have on the caribou herds that migrate through unit 22. I think it is a logical suggestion to decrease the resident bag limits, and keep the non residents bag limit at one bull caribou in order to see a positive change in the declining caribou populations.

Another enviromental factor that has a significant impact on the caribou herd in unit 22 is the predation from grizzly bears. That is why i support prop 28, in order to offer otc grizzly tags to increase the oppurtunity for non res hunters and help resuce the high bear population. Thankyou for taking the time to read my comments and i appreciate all you do for the great state of Alaska and its wildlife.

Thanks,

-Blaise

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Proposal 3: Oppose

Proposal 28: Support

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PC 530

**Name:** Selawik National Wildlife Refuge

**Community of Residence:** Kotzebue, AK

**Submission Time:** 1/13/2024 12:43:50 AM

**Comment:**

see attached

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# United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Selawik National Wildlife Refuge

160 Second Avenue, P.O. Box 270

Kotzebue, Alaska 99752-0270

January 12, 2024



## Memorandum

To: Alaska Board of Game

From: Wilhelm Wiese, Selawik National Wildlife Refuge Manager

Subject: Comments on proposals affecting the Western Arctic Caribou Herd, to be considered at the Western Arctic/Western Region Meeting, January 26-29, 2024

Conservation of the Western Arctic Caribou Herd (WACH) and providing opportunities for continued subsistence uses by local residents are two of the purposes for which Selawik National Wildlife Refuge (Refuge) was established. The Refuge participates in coordinated ecological studies of the herd and, through partnerships with other resource management agencies and local partners, development of management objectives for the herd.

A revised Cooperative Management Plan for the WACH was finalized and adopted in 2019 by the WACH Working Group. Signatories to the plan represent a broad spectrum of stakeholders, including subsistence users from rural villages throughout the herd's range, Anchorage and Fairbanks area hunters, conservationists, hunting guides, transporters, reindeer herders, and resource management agencies (ADF&G, BLM, NPS, USFWS).

Given current WACH population metrics, the Working Group recommends "Preservative" management of the herd. Harvest recommendations from the WACH Cooperative Management Plan (Management Plan) at the Preservative level include:

1. No harvest of calves.
2. Limit harvest of cows by resident hunters through permit hunts and/or village quotas.
3. Limit the subsistence harvest of bulls to maintain at least 30 bulls:100 cows.
4. Harvest restricted to residents only, according to state and federal law. Closure of some federal public lands to non-qualified users may be necessary.

**Selawik Refuge supports following the recommendations of the WACH Cooperative Management Plan.** Comments on specific proposals include:

### Proposal 2

Selawik Refuge is in favor of a reduction in bag limit to one cow caribou per year throughout the range of the WACH. A significant reduction in cow harvest may be needed to allow the WACH to recover, and a limit on cow harvest aligns with Management Plan recommendation #2. However, the proposed reduction in total bag limit of caribou may cause hardship for some residents who rely on caribou. There is insufficient data on current harvest to predict how much the proposed regulation change may or may not affect total number of bulls harvested and the

bull:cow ratio. The bull:cow ratio has remained well above 30:100 (the objective set in the Management Plan) for the past two decades.

#### Proposal 3

Proposal 3 aligns with the Management Plan harvest recommendation #4. If the Board of Game (Board) deems it necessary to reduce harvest of bull caribou and takes action to reduce harvest of bulls by resident hunters (through adopting proposal 2, 5, 36 or 37), then Selawik Refuge is in favor of significantly reducing or eliminating non-resident hunting opportunities throughout the range of the herd until population metrics improve.

#### Proposal 4

Selawik Refuge opposes Proposal 4 as it does not restrict cow harvest enough to adequately address concerns over the WACH population decline and may lead to an increase in harvest of cows during the fall and winter months.

#### Proposal 5

Selawik Refuge opposes Proposal 5 as it does not align with Management Plan recommendation #4, nor result in an equitable reduction in harvest by resident and non-resident hunters, nor address harvest throughout the range of the WACH. If the Board deems it necessary to reduce harvest of bull caribou, then Selawik Refuge is in favor of significantly reducing or eliminating non-resident hunting opportunities throughout the range of the herd until herd population metrics improve. Proposal 5 would not meaningfully reduce harvest by non-residents as the proposed minimum quota, 400 bulls, exceeds the average (256) and maximum (374) number of caribou reported to be harvested by non-residents annually over the past ten years.

#### Proposal 36/37

Selawik Refuge recommends the Board take no action on changes to regulations that do not address harvest throughout the range of the WACH. Significant reductions in cow harvest are warranted throughout the range of the WACH, including GMU 22, 23 24B, 24C, 24D, and 26A. A recent analysis of harvest data from communities in the North Slope Borough suggests that a significant proportion of caribou harvested in Unit 26A are from the WACH.

#### Proposal 38

Selawik Refuge recommends the Board take no action on changes to regulations that do not address harvest throughout the range of the WACH. Adoption of this proposal could result in a reduction of total number of caribou harvested by non-resident hunters, however some non-resident hunting may shift to Unit 26A.

Selawik Refuge appreciates the work of the Board to ensure the WACH continues to benefit Alaska and Alaskan's for generations to come. Questions regarding our comments can be directed to Wilhelm Wiese, Selawik NWR Manager, at [wilhelm\\_wiese@fws.gov](mailto:wilhelm_wiese@fws.gov) or 907-442-5065. Additionally, Selawik Refuge representatives will be available at the Board of Game work session and meeting January 25-29 in Kotzebue to provide additional information, if requested.





PC 531

**Name:** serpa, chasen

**Community of Residence:** Turlock California

**Submission Time:** 1/8/2024 12:39:53 AM

**Comment:**

The opportunity to hunt Caribou in Alaska is a dream becoming reality for me and a few good friends this year. As ethical responsible hunters from out of state this is an opportunity I would like to share with my son one day. I would be very disappointed if this became legally unobtainable to out of state residents.

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 532

**Name:** Shannon, James

**Community of Residence:** Bend, Oregon

**Submission Time:** 1/2/2024 7:26:41 AM

**Comment:**

I oppose proposal 3. As I non-resident who hopes to come to Alaska someday and hunt caribou this is ridiculous to close it down. There is many other ways to responsibly manage numbers.

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

Proposal 3: Oppose

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**Name:** SHIMA, SHANE

**Community of Residence:** RONAN, MONTANA

**Submission Time:** 1/11/2024 6:34:59 PM

**Comment:**

This is sad that the only solution you have come up with is to close these areas to non-residents of Alaska USA citizens. Should we close Glacier Park and Yellowstone Park to "non-residents" of Montana? This might sound absurd to you but Glacier park already has a reservation system to limit or control this resource. These animals are a resource owned by each state. Native Tribes say they own the animal if on or once it crosses onto "native land" on Indian Reservations. Each state has an obligation to share this resource with other state's residents. Should we close our elk and big horn sheep hunting to Non-residents of Montana? Absolutely not, we share up to 10% to ALL USA residents not from Montana. If the population goes down ALL hunters sacrifice, resident and non-resident. I see only 5% of the "reported" or "estimated" populations are harvested by non-residents. This is only a few hundred animals of several hundred thousand. This is ridiculous. Most locals in Alaska, non-native and native do not even report their kills. You have little idea who is killing what. If you truly want to solve this issue move towards working together, native and non-native game agencies. Limit local hunting by 1%? Encourage reporting by locals? I live on an Indian Reservation in Montana. Try to work together for the resource. We are not the answer, so don't pick or start this fight. If you start or continue this, it will divide us even more. This will lead to ALL states doing the same thing. We are a "UNITED" States of America so keep it this way. Thanks for your time. Shane Shima

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Proposal 3: Oppose

Proposal 38: Oppose

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PC 534

**Name:** Showalter, Eric

**Community of Residence:** Woodruff, Utah

**Submission Time:** 1/13/2024 4:41:51 AM

**Comment:**

I do not support proposals #3 or #38 which would eliminate non resident hunting opportunities.

I believe the resident quota should be changed to 3 bulls and 1 cow per year.

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Proposal 3: Oppose

Proposal 38: Oppose

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PC 535

**Name:** Sill, Matt

**Community of Residence:** Castro Valley, California

**Submission Time:** 1/2/2024 5:42:22 AM

**Comment:**

Shutting down non resident hunting, hurts a community and states income, learning about new wilderness, education on species . Its important we keep tradition alive, an hunting education alive for generation to come.

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Proposal 3: Oppose

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PC 536

**Name:** Simmons, Cole

**Community of Residence:** Marysville, Kansas

**Submission Time:** 1/2/2024 4:07:38 PM

**Comment:**

I oppose proposal 3.

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

Proposal 3: Oppose

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PC 537

**Name:** Simms, Matt

**Community of Residence:** Mapleton, Utah

**Submission Time:** 1/13/2024 2:05:20 AM

**Comment:**

Oppose prop 3 & 38

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

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

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

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

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

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

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

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

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

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

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Proposal 3: Oppose

Proposal 38: Oppose

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**Name:** Simpson, Chandler

**Community of Residence:** Walla Walla, WA

**Submission Time:** 1/8/2024 2:14:27 PM

**Comment:**

Please keep the non resident hunting opportunity OPEN for caribou. The harvest of such a small number of bull caribou is not affecting the total population. However, the money brought to local communities and the state by these non resident hunters is significant. I am OPPOSED to Proposal 3 and Proposal 38 which would close or reduce this hunting opportunity for non residents.

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Proposal 3: Oppose

Proposal 38: Oppose

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PC 538



PC 539

**Name:** Simpson, Jake

**Community of Residence:** Burbank, Washington

**Submission Time:** 1/6/2024 2:00:43 PM

**Comment:**

Proposal 3 & 38- Oppose

I understand ADFG has an obligation to manage game for Alaska residents and make sure that residents who pay taxes have their interests taken as a priority. But based on the data posted by ADFG it appears that closing hunting in those units to all non residents hunters will have no desired change based on science. A non resident can harvest 1 bull caribou in those units in a year. This is 1/5 of the harvest allowed to residents. Furthermore this completely takes away the opportunity to non resident hunters to experience a caribou hunt. I personally have been dreaming of a caribou hunt since I was a kid and have been planning to do a hunt in the next 2-3 years. If these propositions are adopted I, and my friends, will never get the opportunity to harvest 1 bull caribou. Taking away the opportunity for a non resident, who can not hunt this species in any other state in the lower 48, to allow the continued harvest of 5 animals per year for a resident seems like a steep change with no science to back this decision. I implore the ADFG to look at other options that would still allow a normal person to experience caribou hunting in Alaska.

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

Proposal 3: Oppose

Proposal 38: Oppose

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**PC 540****Name:** Sjogren, Jay**Community of Residence:** Kenai, Alaska**Submission Time:** 1/10/2024 3:34:22 AM**Comment:**

Addressing caribou population decline requires a comprehensive strategy that considers all factors, including climate change and habitat loss, not just hunting regulations. Also is the loss of revenue for the state. Out of state hunters bring much needed monies to the table that is met with federal funding to help properly / scientifically research the health of the areas wildlife (Caribou). Please do not allow this to pass.

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Proposal 3: Oppose

Proposal 38: Oppose

**PC 541****Name:** Sliger, Stephen**Community of Residence:** Laramie, WY**Submission Time:** 1/11/2024 5:22:13 PM**Comment:**

Hello, I understand as a non resident my opinion has bias. I am opposed to the closing of non resident hunting for caribou. This closure is not based on science. This seems to be motivated by outside sources. Herd dynamics fluctuates over time. This has been proven. Taking into consideration that the non resident take is very limited. Eliminating it would not help these herds. This will only hurt the communities that rely on the dollars spent by non residents. These communities need the money and all the other things that come along, such as jobs, and meat donations. Thank you for allowing us to comment.

Sincerely

Stephen Sliger

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Proposal 1: Oppose Proposal 2: Oppose

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PC 542

**Name:** slocum, joe

**Community of Residence:** Houghton

**Submission Time:** 1/10/2024 6:08:11 PM

**Comment:**

Dear members of the Board of Game,

please do not consider passing proposals 3 and 38 for the great state of Alaska. Caribou hunting opportunities for nonresidents are very limited, and us non-native hunters bring a lot to the local economy when we travel north. Given the data that nonresident hunters are not to blame for declining herd numbers, why would proposals such as 3 and 38 even be considered? Any time public land closes opportunities for some all Americans lose.

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

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PC 543

**Name:** Sly, John

**Community of Residence:** Gig Harbor, WA

**Submission Time:** 1/2/2024 6:14:54 AM

**Comment:**

I strongly do not support proposal #3. The elimination of non resident hunting opportunity for caribou in these units is not based in science. This is merely an attack and agenda to eliminate hunting.

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

Proposal 3: Oppose

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PC 544

**Name:** Smith, Bob

**Community of Residence:** Richmond, Virginia

**Submission Time:** 1/3/2024 3:37:26 AM

**Comment:**

I strongly oppose proposals 3 and 38 to eliminate nonresident hunting in parts of Alaska. If you want to bolster herd numbers, stop the wholesale massacre of cows.

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

Proposal 3: Oppose

Proposal 38: Oppose

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**PC 545****Name:** Smith, Carl**Community of Residence:** Laramie, WY**Submission Time:** 1/11/2024 6:43:09 PM**Comment:**

I am writing in as a nonresident of Alaska to oppose proposals 3 and 38, which to my understanding would prohibit non-residents from hunting caribou on federal land in much of Alaska. I understand the caribou population is on the decline and below objective, but to think that closing hunting to nonresidents, who only kill relatively few caribou bulls each year, is a asinine.

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Proposal 3: Oppose

Proposal 38: Oppose

**PC 546****Name:** smith, charles**Community of Residence:** Richmond, Va**Submission Time:** 1/13/2024 12:03:57 AM**Comment:**

I oppose proposals 3 and 38 for the reasons below.

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

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

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

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



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

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

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

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

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

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

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Proposal 3: Oppose

Proposal 38: Oppose

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**Name:** Smith, Derik

**Community of Residence:** Springfield, OR

**Submission Time:** 1/13/2024 1:17:43 AM

**Comment:**

Good day,

After reviewing the listed proposals, it looks to me like the supporters of #3 & #38 are not addressing the real issues of big game management, and putting the liability of herd reduction on the group that least affects the percentage of harvest. Not to mention the economic hardships that will be imposed on the population that earns an income from servicing the out of state hunting community.

I know what it's like to see out of state hunters with harvest tags in my area, when I am not able to draw a tag for myself, and it sucks. Yet, I don't want to see the cascading effect of states closing hunting opportunities for non-resident hunters, as I would like to have the opportunities



PC 547

for adventures in all of the USA. After all, my taxes go to support all federal lands, not just the ones in my state,

My hope is that you will consider the impacts of your decisions on the hunting community at large, and not let emotions and politics govern your decisions.

Respectfully,

Derik Smith

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Proposal 3: Oppose

Proposal 38: Oppose

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**Name:** Smith, Justin

**Community of Residence:** Castle rock colorado

**Submission Time:** 1/3/2024 3:06:54 AM

**Comment:**

No to 3 and 38



PC 548

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 549

**Name:** Smith, Martin

**Community of Residence:** New Castle Colorado

**Submission Time:** 1/9/2024 10:54:37 PM

**Comment:**

Opposed to #3 and #38

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 550

**Name:** smith, mindy

**Community of Residence:** Amarillo

**Submission Time:** 1/8/2024 4:07:18 PM

**Comment:**

Over the years, in response to declining Caribou, The Alaska Board of Game has targeted out of state hunters with regulations that have progressively decreased their hunting opportunity. The last was in 2015 when Alaska Board of Game regulated these hunters to One Bull Caribou per year and taken only between August 1 - Sept 30th.

WE DO NOT SUPPORT PROPOSAL #3

We do support Proposal #2 This would for the first time in over 40 years decrease the number of Caribou that can be harvested by Alaska Residents. Currently, they can harvest 5 per DAY! Yes, per DAY! : BULLS: No-Closed Season as many as 5 per day for 365 days/year per resident; COWS: open season July 1 - March 31 and allowed harvesting during the winter.

WE DO SUPPORT PROPOSAL #2

I am supporting this proposal #28 as the bear are having a critical impact on not only the Western Arctic Caribou Herd but also a nearby Mulchatna herd. It would be great to have a simple process.

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Proposal 2: Support Proposal 3: Oppose

Proposal 28: Support



PC 551

**Name:** Soares, DYLAN

**Community of Residence:** Denver, Colorado

**Submission Time:** 1/12/2024 5:38:09 AM

**Comment:**

I am strongly opposed to proposals 3 and 38, which close non-resident caribou hunting in northwest Alaska. Nonresidents have an minimal impact on the caribou population, as they are restricted to harvesting bull caribou. Resident and subsistence harvest includes cows and calves, which have a much larger impact on the population. In addition, nonresident harvest is minimal compared to resident and subsistence harvest.

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Proposal 3: Oppose

Proposal 38: Oppose

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**PC 552****Name:** Soule, Scott**Community of Residence:** Oxford, MI**Submission Time:** 1/12/2024 12:17:24 AM**Comment:**

Closing caribou hunting to non residents makes no sense. Non residents harvest very few animals and are allowed to only harvest bulls. Changing regulations surrounding cow harvest makes sense since they drive herd growth and viability.

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Proposal 1: Support Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Oppose

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**PC 553****Name:** Sparks, Thomas**Community of Residence:** Nome, Alaska**Submission Time:** 1/11/2024 2:15:21 AM**Comment:**

I am opposed to proposal 19. The Tier II system awards higher points to those with longer dependency of the limited Musk Ox resource. Obtaining a permit has removed much stress on myself getting quality meat as other game species are getting more difficult to harvest with the short moose season and the Western Arctic Caribou decline. Limiting this opportunity if I am successfully drawn for a permit will deny an important meat source for me and my family. I am opposed to proposal 20. I would much rather have the board do away with trophy destruction on the Musk ox altogether since we have been in Tier II for many years now. When first implemented as I recall we were in Tier I and due to the limited number of animals available trophy destruction was a way to discourage rack hunters from coming on to the Seward Peninsula and out competing the local hunters. I would encourage the Board to consider some provision that if the head is removed from the GMU then the trophy value should be destroyed like it is now if keeping the trophy destruction is desired. I am opposed to Proposal 21 as taking cows will limit growth and more opportunity will come faster with more cows giving birth. I would rather see a targeted young bull harvest increase if the idea is to increase harvest numbers.



This idea has been floated around locally but not supported due to many hunters not being able to differentiate young bulls and cows. With the many years of hunting and education among hunters this may not be an issue any longer. I support proposal 25. I think with the very short season in GMU 22C (most cases a day or two of hunting is all we get locally) it does not seem right that nonresident hunters are still able to harvest bulls in this subunit.

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

Proposal 19: Oppose Proposal 20: Oppose Proposal 21: Oppose Proposal 25:  
Support

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PC 554

**Name:** Sperry, Jeff

**Community of Residence:** Eagle River

**Submission Time:** 12/12/2023 12:24:04 AM

**Comment:**

Proposal 43: I am opposed to this proposal. I believe that before changing to a permit system that affects Alaska hunters that the nonresident and youth hunts should be eliminated. Elimination of nonresidents hunting should be the first step prior to putting restrictions on residents. Some registration hunts in Alaska have a limited number of permits, which if that occurred would also put further restrictions on Alaska residents.

Proposal 44: I am opposed. Prior to putting restrictions on resident hunters the nonresidents should be excluded from hunting in these areas. Additionally, if there is concern about increased sub legal harvest I would suggest increasing the penalty for taking a sub legal sheep.

Proposal 45: I am opposed. Again, before putting restrictions on Alaska residents I believe we should eliminate nonresident hunting in these areas.

Proposal 46: I am opposed. Before putting restrictions on Alaska residents I believe we should eliminate nonresident hunting in these units.

Proposal 47: I am opposed. The bison hunts are a special type of hunt and I do not believe that a proxy should be allowed. It is difficult to draw a permit for this hunt, so I believe the permits should go to people who will actually participate in the hunt.

Thank you for allowing me the opportunity to provide my opinions on these proposals.

Jeffrey Sperry  
Eagle River, Alaska

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PC 555

**Name:** Spring, Rebecca

**Community of Residence:** Alberton, MT

**Submission Time:** 1/13/2024 2:46:28 AM

**Comment:**

Nonresident caribou harvest does not impact the population, it does affect the local economy. Caribou populations are known their fluctuation. Please continue to allow some non resident harvest.

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 556

**Name:** Sprouse, Don

**Community of Residence:** Mobile, Alabama

**Submission Time:** 1/8/2024 8:37:19 PM

**Comment:**

Please keep the caribou hunts OPEN for non residents. The harvest of such a small number of bull caribou is not impacting the total herd numbers. I oppose removing or reducing non resident caribou hunters.

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



Proposal 3: Oppose

Proposal 38: Oppose



PC 557

**Name:** Stanciu, Colton

**Community of Residence:** Parma, ID

**Submission Time:** 1/8/2024 4:32:43 AM

**Comment:**

The take of caribou nonresident hunters plays an insignificant role in caribou populations, but a huge role in the local economies of these areas. I oppose measures that would take away these economic opportunities from residents and these traditions away from nonresident hunters.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 558

**Name:** stanley, Tyler

**Community of Residence:** Ravenna Ohio

**Submission Time:** 1/7/2024 11:35:48 PM

**Comment:**

No good

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 559

**Name:** Stein, Dylan

**Community of Residence:** Spearfish South Dakota

**Submission Time:** 1/3/2024 4:58:55 AM

**Comment:**

I do not support the close of nonresident caribou hunting. It is supported that it will not make a difference to close nonresident hunting. I do believe resident hunters should be limited to one cow only and lower the limit, this seems logical to help the herd rebound!

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

Proposal 1: Support Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Support

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PC 560

**Name:** Steiner, Rick

**Community of Residence:** Anchorage

**Submission Time:** 1/4/2024 3:36:45 PM

**Comment:**

I strongly support Proposal 6, to suspend any hunting take from the Mulchatna Caribou Herd for 5-10 years, in order to allow the herd to recover from its current low level. The State of Alaska should clearly have implemented such a take restriction years ago, but due to political pressure, didn't. And now, you are trying to distract from your past mismanagement with your shameful predator control program on bears and wolves in the area. That needs to end, and you need to shut down all hunting on the herd until it recovers.

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

Proposal 6: Support

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PC 561

**Name:** Steiner, Rick

**Community of Residence:** Anchorage

**Submission Time:** 1/4/2024 6:29:12 PM

**Comment:**

In addition to my previous comment in support of Proposal 6 (to suspend the hunt of the Mulchatna Caribou Herd), I am adding this comment:

Given the Board of Game's (BOG) continuing history of ignoring the overwhelming majority of public comments re: wildlife management in Alaska; consistently ignoring science in favor of politics; your clear (and unconstitutional) lack of representation of the majority of Alaska citizens; your blind support for narrow interests in consumptive take over conservation of Alaska wildlife; and specifically your approval of the unprecedented, disgraceful "Mulchatna Massacre" of brown bears, black bears, and wolves last spring attempting to distract attention from your prior mismanagement of the herd (e.g. not suspending hunting years ago as the herd declined); I respectfully request that each of you resign your Board seat immediately, and suspend/reschedule the current BOG meeting until a constitutionally compliant BOG is appointed and confirmed.

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

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PC 562

**Name:** Stenroos, Sam

**Community of Residence:** Vadnais Heights, MN

**Submission Time:** 1/6/2024 6:53:30 PM

**Comment:**

Proposal #3 and #38 would significantly impact hunting opportunities for nonresidents in Alaska. These two proposals would also impact outfitter's that rely on nonresidents for their business.

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 563

**Name:** Stephens, Riley

**Community of Residence:** Logan, Utah

**Submission Time:** 1/3/2024 5:54:44 AM

**Comment:**

I acknowledge and agree

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

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

Proposal 37: Support Proposal 38: Oppose Proposal 39: Support Proposal 40: Support Proposal 41: Support Proposal 42: Support

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PC 564

**Name:** Stevenson, Warren

**Community of Residence:** Saskatoon, SK

**Submission Time:** 1/9/2024 3:41:04 AM

**Comment:**

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

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

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

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

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

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

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

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

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

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



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

Proposal 3: Oppose

Proposal 38: Oppose



PC 565

**Name:** Stewart, Charles

**Community of Residence:** Lyons, Colorado

**Submission Time:** 1/13/2024 4:22:59 AM

**Comment:**

I oppose proposal 3 & 38 which are both a knee jerk reaction to a larger more dynamic problem. I feel this lacks any scientific evidence to back up the claim that the problem is non resident hunters are putting so much pressure on the resources that they are creating massive population reductions.

Climate change, historic population ebbs, and frankly an avg of 10000 caribou taken from the herd each season by subsistence hunters seem like more likely candidates to investigate.

This seems to solely benefit subsistence hunters. This is such a neat sighted stunt on their part that they don't see they are bringing about their own demise. Without the support and financial backing of all the people around the world who want to go to Alaska and caribou hunt someday there won't be any resources to manage and grow herds. Nor will there be a large voice to make sure that hunting traditions are protected for future generations.

Taking access away from everyone but the lucky few will hurt the caribou herds, the guides and outfitters who make their livings from non resident hunters, transporters, mom and pop shops, and the whole state of Alaska who depend on the money that roles in from caribou hunters each year.

And at the end of the day these proposals will not solve the problem of a depleted herd.

Do not allow these proposals to pass, Please!!!

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

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

Proposal 36:



PC 566

**Name:** Stewart, Terry

**Community of Residence:** Allen, TX

**Submission Time:** 1/3/2024 1:02:57 AM

**Comment:**

I would like to express by objections to proposals 3 and 38 that would prevent nonresident hunters from hunting in the region.

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 567

**Name:** Stier, Hunter

**Community of Residence:** Belgrade, Montana

**Submission Time:** 1/7/2024 4:04:34 PM

**Comment:**

Proposal #3 & #28: Oppose

The board has failed to demonstrate a biological need for these proposals or how these changes would correct the concerns that spawned these proposals.

Additionally, Alaska game and fish do not see a need for these changes. I would like to see the department maintain its role as the science based decision maker in managing Alaska's hunters and wildlife.

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

Proposal 3: Oppose

Proposal 28: Oppose



PC 568

**Name:** Stills, Jordan

**Community of Residence:** Midlothian, TX

**Submission Time:** 1/3/2024 12:17:58 AM

**Comment:**

Oppose prop 3 and 38

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 569

**Name:** Stillwaugh, Damon

**Community of Residence:** Idaho

**Submission Time:** 1/2/2024 11:58:19 AM

**Comment:**

I oppose puposal 3.

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

Proposal 3: Oppose

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PC 570

**Name:** Stillwaugh, Damon

**Community of Residence:** Idaho

**Submission Time:** 1/10/2024 1:18:40 AM

**Comment:**

I oppose proposal 3 and 38. Restricting non residents is a terrible idea. Non residents bring a lot of revenue to the state and there is no reason to keep us from coming to hunt and bring money to your state. I have personally been caribou hunting up there and absolutely loved the experience. I hope to return and hunt again. I also really hope for my kids to be able to have the opportunity to come hunt one day also. Please keep non resident hunts open and available.

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

Proposal 3: Oppose

Proposal 38: Oppose

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**PC 571****Name:** Stockmoe, Sean**Community of Residence:** Colorado Springs, CO**Submission Time:** 1/13/2024 2:38:49 AM**Comment:**

I oppose proposal #3 and proposal #38. I think that out of state hunters are not having as large of an impact in the animal population as natural herd fluctuation. If out of state hunters were not allowed, there would be major economic impacts on the industry fueled by supporting hunters, impacting many livelihoods. The tag money also goes to further conservation of the whole state.

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

Proposal 3: Oppose

Proposal 38: Oppose

**PC 572****Name:** Stoffel, Jerid**Community of Residence:** Kimmell, Indiana**Submission Time:** 1/7/2024 4:07:52 AM**Comment:**

Proposal 3 and 38: I am against these two proposals to eliminate nonresident caribou hunting. Nonresident hunting has no biological impact on the caribou population. These proposals take the opportunity to experience Alaska caribou hunting away from nonresidents like me.

For the same reasons, I also oppose the proposal that wants to eliminate nonresident moose hunting, but I can't remember the number.

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

Proposal 3: Oppose

Proposal 38: Oppose





PC 573

**Name:** Stokes, Ryan

**Community of Residence:** Heber City, Utah

**Submission Time:** 1/6/2024 5:07:58 AM

**Comment:**

Do not agree with the reduction or removal of non resident hunting opportunities in AK

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

Proposal 3: Oppose

Proposal 38: Oppose



PC 574

**Name:** Stokes, Ryan

**Community of Residence:** Heber City, Utah

**Submission Time:** 1/8/2024 3:22:00 PM

**Comment:**

I strongly support the reduction in take of female caribou. Non resident hunters make up 0.1% of harvest (harvest compared to number of bulls on the landscape) each year while resident hunters harvest many more, including females. If the goal is to increase the population, we must start with reducing or eliminating harvest of female caribou. Please follow science proven/based approaches

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

Proposal 2: Support



PC 575

**Name:** Stone, Steven

**Community of Residence:** Roanoke Virginia

**Submission Time:** 1/6/2024 4:24:11 PM

**Comment:**

I strongly oppose proposal #3 and #28 that would eliminate non residents from hunting caribou in these regions. I am a lifelong hunter and know how much local business and communities rely on the tourism dollars. I have hunted in Alaska many times and look forward to hunting caribou in this area in the future

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

Proposal 3: Oppose

Proposal 28: Oppose

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PC 576

**Name:** Stone, Steven

**Community of Residence:** Roanoke va

**Submission Time:** 1/6/2024 4:27:54 PM

**Comment:**

I oppose proposal #38 that would limit non resident caribou hunts. This will do great harm to local businesses that rely in the revenue generated by non resident hunters.

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

Proposal 38: Oppose

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PC 577

**Name:** Stout, Heidi

**Community of Residence:** Inkom, ID

**Submission Time:** 1/8/2024 4:40:13 PM

**Comment:**

Proposal 3 and 38 I oppose. This is less than a 1% impact and an impact on the local economy. This is not worth the change impact and greater cause should be looked at with other factors.

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

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PC 578

**Name:** Strough, Caleb

**Community of Residence:** McCall, Idaho

**Submission Time:** 1/3/2024 2:20:40 AM

**Comment:**

I oppose proposals 3 and 38. There is no population impact on caribou herds from small numbers of nonresident hunters taking bulls only.

Wildlife management should be left to the state to manage, not unelected bureaucrats trying to dabble in something they're not familiar with.

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 579

**Name:** Suchy, Jamie

**Community of Residence:** MN

**Submission Time:** 1/13/2024 2:04:10 AM

**Comment:**

Do not shut down the non-resident hunting brings in money to the state and has little to no impact on the herd

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 580

**Name:** Suetterlin, Marshall

**Community of Residence:** Colorado Springs CO

**Submission Time:** 1/13/2024 12:06:38 AM

**Comment:**

Public land is...public. No portion should be eliminated for use by any means to non residents.

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

Proposal 3: Oppose

Proposal 32: Oppose Proposal 33: Oppose



PC 581

**Name:** Sullivan, Aaron

**Community of Residence:** Grass Valley, CA

**Submission Time:** 1/13/2024 12:51:21 AM

**Comment:**

Dear Board Members/To Whom it May Concern:

I am writing in broad support that, if the science bears it out, the overall reduction in quota of take/harvest of caribou of the Western Arctic Herd should be implemented.

However, I do not support the complete elimination of opportunity for non-resident as proposed, specifically Proposals 3 and 38, for the following reasons:

1. The Limited Impact of Non-Resident Hunting as Non-resident hunters have a minimal impact on the caribou population as they (a) harvest bulls, not cows or calves, and (b) harvest less than approximately 0.18%, or TWO bulls of for every THOUSAND animals.
2. The Lack of Scientific Evidence as there is limited and insufficient scientific evidence that a 0.18% take from non-resident hunting is demonstrable in the decline in the caribou population. This also paints non-residents as the 'cause' of the decline, which is incorrect.
- 3 The Precedent for Wildlife Management as this he closure sets a concerning precedent for wildlife management resulting in extensive restrictions without clear scientific backing.

Thank you for your time and consideration,

Aaron Sullivan

Grass Valley, CA

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

Proposal 2: Support Proposal 3: Oppose Proposal 4: Support Proposal 5: Support Proposal 6: Support  
Proposal 18: Support Proposal 36: Support Proposal 37: Support  
Proposal 38: Oppose



PC 582

**Name:** Sullivan, Gregory

**Community of Residence:** Port Angeles, WA

**Submission Time:** 1/8/2024 8:44:16 AM

**Comment:**

Please keep the non resident hunting opportunity OPEN for caribou. The harvest of such a small number of bull caribou is not affecting the total population. However, the money brought to local communities and the state by these non resident hunters is significant. I am OPPOSED to closing or reducing this hunting opportunity for non residents. Especially given that it is a dream of mine to participate in the hunt, once I can afford to do so.

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

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

Support Proposal 29: Support Proposal 30: Support Proposal 31: Support Proposal 33 Support  
Proposal 38: Oppose Proposal 41: Support Proposal 190: Support

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PC 583

**Name:** Swant, Tyler

**Community of Residence:** Huntley, Montana

**Submission Time:** 1/3/2024 4:31:45 AM

**Comment:**

Hunting nonresident caribou in Alaska was an adventure my father and I look back on daily. With Proposal 3 and 38 less people are going to be able to experience the affordable beauty that hunting in the Alaska artic provides. As someone who does not like to tell residents how to run their state fish and game, I hope other optional are available to help support the caribou number. Maybe bulls only for residents or a draw system for nonresidents?

Tyler Swant

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 584

**Name:** Taft, Brenton

**Community of Residence:** Sandia Park, NM

**Submission Time:** 1/13/2024 2:25:33 AM

**Comment:**

As a nonresident hunter I oppose Proposals 3 and 38.

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 585

**Name:** Talley, Jarrett

**Community of Residence:** Sandy Hook, Virginia

**Submission Time:** 1/9/2024 12:33:00 PM

**Comment:**

Opposition to proposal #3 and #38

The following are my objections to proposal #3 and #38. Thank you for your considerations.

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

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

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

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

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

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

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

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

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

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

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

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

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PC 586

**Name:** Talley, Jerry

**Community of Residence:** Bumpass, VA

**Submission Time:** 1/9/2024 12:37:09 PM

**Comment:**

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

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

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

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

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

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

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

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



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

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

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

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



PC 587

**Name:** Talley, Regan

**Community of Residence:** Sandy Hook, VA

**Submission Time:** 1/9/2024 12:35:09 PM

**Comment:**

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

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

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

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

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

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

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

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

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

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

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**PC 588****Name:** Taylor, Jay**Community of Residence:** Anchorage, Alaska**Submission Time:** 1/8/2024 8:24:22 PM**Comment:**

Proposals 3 and 38

I do not support those proposals. The amount of take by non-residents is so insignificant compared to the resident take that it seems like there is more at play here. We should limit the gender of caribou that is allowed to be taken by everybody to keep in line with good herd management as outlined by biologists. Once a president is set the government does not give back to the people it is supposed to work for.

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Proposal 3: Oppose

Proposal 38: Oppose

**PC 589****Name:** Taylor, Kneeland**Community of Residence:** Anchorage**Submission Time:** 1/13/2024 12:46:31 AM**Comment:**

Proposal 2. Support with Amendment. The decline in the Western Caribou herd will continue unless hunting is restricted more than proposed by the Western Arctic Caribou Working Group. The WACWG proposal is inadequate because it fails to limit the hunt to Tier 1 subsistence users. I personally know at least two Anchorage residents who are not subsistence users who intend to take part in next years hunt of Western Arctic Caribou. They are wonderful people but the preservation of Alaska's wildlife is the first priority. Article VIII, Section 4 of the Constitution mandates sustained yield for generations, and does not mandate hunter opportunity.

Proposal 3. Support. The Western Arctic caribou should be off limits to residents of States other than Alaska,

Proposal 4. Oppose. This proposal provides for the take of too many caribou. It is time to give these herds a break from over harvesting.

Proposal 5. Oppose. Non residents should not be allowed to take caribou when populations are crashing.

Proposal 6. Support. All hunting of Mulchatna Caribou should be closed until the herd recovers. The wounding and illegal take of Muchatna Caribou were found by the Department's biologists to be primary causes of the rapid decline of the herd. Stopping the wounding and illegal take through meaningful enforcement should be a priority. The sustained yield of this herd is constitutionally mandated The Department's first priority should be conservation, not hunter opportunity.

Proposal 12. Support. The wounding and illegal take of Muchatna Caribou were found by the biologists to be one of the primary causes of the rapid decline of the herd. Small caliber weapons are part of the problem. of caribou.

Proposal 13. Oppose. Fifty ptarmigan a day is over-harvesting, and unethical.

Proposal 14 Oppose. Musk ox should not be hunted other than pursuant to Federal subsistence regulations.

Proposal 15. Oppose. Musk ox should not be hunted other than pursuant to Federal subsistence regulations.

Proposal 16. Oppose. Wolves are not vermin, and the proposal would take them during the denning season which is repugnant, and threatens their sustained yield.

Proposal 17. Oppose. The slaughter of bears pursuant to the misguided Mulchatna IM program has already decimated their numbers, and threatens their sustained yield guaranteed by the Constitution.

Proposal 18. Oppose. See comments re Western caribou above.

Proposal 46. Support with Amendment. Sheep populations throughout most of the State are declining rapidly. I am a mountain climber and seeing these animals high up in the mountains is a wonderful part of mountaineering. It is time for the Department to give out a limited number of permits in all areas where sheep are found, and allow permit holders to take any male; thus taking the pressure off the dominant full curl males, and the resulting disruption of sheep inter-family dynamics. The number of permits should be divided between non residents and residents in order to allow commercial guides, and their employees, assistants, transporters and others to continue their lifestyles, while ensuring that Alaska residents get a large share. The number of permits should be carefully limited and controlled to avoid over-hunting, and wounding of sheep. Alternatively, all hunting should be closed in some parts of the state, for as long as it takes for sheep populations to recover. The Kenai Peninsula is a good example.

Proposal 48. Oppose. Tags should be obtained before bears are taken. Enforcement and monitoring will be aided

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Proposal 2: Support with Amendment Proposal 3: Support Proposal 4: Oppose Proposal 5: Oppose Proposal 6: Support Proposal 12: Support Proposal 13: Oppose Proposal 14: Oppose Proposal 15: Oppose Proposal 16: Oppose Proposal 17: Oppose Proposal 18: Oppose



PC 590

**Name:** Taylor, Ryan

**Community of Residence:** New Meadows, ID

**Submission Time:** 1/3/2024 4:25:34 AM

**Comment:**

I strongly disagree with a non resident closure to unit 23 for caribou. The small effect non resident hunters have on the population is miniscule compared to residents having a daily limit on cows.

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Proposal 3: Oppose

Proposal 38: Oppose

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**PC 591****Name:** Tennant, Jonathan**Community of Residence:** Oswego, New York**Submission Time:** 1/4/2024 12:19:03 AM**Comment:**

Non resident hunting is inconsequential to the changes in caribou herd populations. Subsistence hunting makes up almost ALL of the herd harvests, and they are allowed to kill cows which more directly affect herd population. This proposal contradicts herd studies and is a direct attack on hunting opportunities for fellow Americans. PLEASE do not take the dream of Alaskan hunting and its wilderness away from fellow Americans who do not have opportunity to live in the beautiful state of Alaska.

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

Proposal 3: Oppose

Proposal 38: Oppose

**PC 592****Name:** Tennant, William**Community of Residence:** New York**Submission Time:** 1/4/2024 1:38:52 AM**Comment:**

Non resident hunting is inconsequential to caribou herd populations. Subsistence hunting accounts for almost all of the caribou harvests and they are allowed to kill cows which more directly affect the health of the herd. This proposal completely contradicts herd studies and is a direct attack on hunting opportunities for fellow Americans. I speak for all hunters when I say no one wants this and it solves nothing.

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

Proposal 3: Oppose

Proposal 38: Oppose





PC 593

**Name:** Thede, Tyler

**Community of Residence:** Cedarburg, WI

**Submission Time:** 1/13/2024 12:57:45 AM

**Comment:**

I oppose proposals 3 and 38.

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

Proposal 3: Oppose

Proposal 38: Oppose

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PC 594

**Name:** Thennis, Bob

**Community of Residence:** Great falls montana

**Submission Time:** 1/2/2024 10:48:49 PM

**Comment:**

I am opposed to number 3

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

Proposal 3: Oppose

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PC 595

**Name:** Theodore Roosevelt Conservation Partnership (TRCP)

**Community of Residence:** Anchorage, AK

**Submission Time:** 1/13/2024 8:54:14 AM

**Comment:**

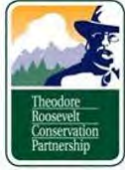
See attached.

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Proposal 2: Support Proposal 3: Oppose Proposal 5: Oppose  
Support Proposal 38: Oppose

Proposal 37:

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January 12, 2024

Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811

**RE: TRCP Comments on 2024 Western Arctic/Western Proposals**

*Submitted electronically via the Board of Game comment portal*

Dear Board of Game members:

Thank you for your service on behalf of Alaska's wildlife resources. We appreciate the opportunity to provide the following comments regarding several Western Arctic/Western Region proposals under consideration in Kotzebue in January 2024.

The Theodore Roosevelt Conservation Partnership (TRCP) is a national conservation organization working to guarantee all Americans quality places to hunt and fish. The TRCP works with 63 [partner organizations](#)—including the Association of Fish & Wildlife Agencies, The Wild Sheep Foundation, and Ducks Unlimited—and represents more than 130,000 individual members nationally, including approximately 1,000 Alaskans. Our members care deeply about the conservation of our public wildlife resources and important habitat, and the continuation of our hunting opportunities and outdoor traditions.

**PROPOSAL 2**

The TRCP **SUPPORTS** this proposal **WITH AN AMENDMENT**. Given the conservation concerns regarding the Western Arctic Herd, we appreciate this locally-driven effort to slow the population decline. While caribou herds experience natural fluctuations in population, this decline—from 490,000 caribou in 2003 to 152,000 caribou in 2023—is particularly concerning due to the importance of the WAH to subsistence and recreational hunters. The herd has been below the population objective of 200,000 since at least 2021.

The TRCP concurs with the department's analysis that, "reducing this harvest, particularly cow harvest, is an important step to slowing population decline." Resident harvest accounts for approximately 95% or more of the total harvest, and nearly 100% of cow harvest. We recognize that this change to 4 caribou a year—only one of which may be a cow—represents a significant

reduction for residents, and we applaud the Kotzebue Advisory Council and the Western Arctic Caribou Herd Working Group for initiating this change.

We especially welcome the emphasis on reducing cow harvest given the above-average rates of WAH cow mortality since 2018. To grow the WAH, adult cow survival must increase. We encourage the department to continue to assess the feasibility of allowing for cow harvest until the herd's population dynamics have improved.

As recommended by the department, **we support an amendment to retain the existing Unit 26A seasons and bag limits** due to the stable populations of the other herds in Unit 26A ask the board to **defer decisions on units 21D Remainder, 24B, 24C, and 24D until the Interior & Eastern Arctic Region meeting in March 2024.**

### **PROPOSAL 3 – OPPOSE**

TRCP **OPPOSES** this proposal to eliminate all nonresident hunting opportunities in the WAH range. While we believe the burden of conserving the Western Arctic Herd should be shared by all user groups, this proposal fails to account for the number of nonresident restrictions enacted over the last three decades. More than 12 separate state and federal actions have restricted nonresident and non-local hunting opportunity in the WAH range, dating back to 1988. Millions of acres of federal public land in Unit 23 are currently closed to non-local caribou hunting.

Nonresidents generally account for 5% or less of WAH total harvest, and this user group selectively harvests mature bulls. The current WAH bull-to-cow ratio (50:1) remains far above the 30:1 management objective. Since 2012, nonresident harvest averaged 256 caribou and the highest nonresident harvest was 374 caribou. In 2022, the WAH harvestable surplus was 7,872 caribou and nonresident harvest was 175 caribou. Nonresident reporting is nearly 100%, which helps the department monitor the nonresident harvest.

Some nonresidents also harvest wolves and bears during their caribou hunts, which may have a conservation benefit. The department reported that even without human harvest, WAH survival rates in recent years indicate continued decline due to natural mortality. Of the investigated mortality events for adult cow caribou from 2006-2022, the department attributed 51% to predation. If the board were to implement additional restrictions on nonresidents, predator hunting efforts could be reduced.

The Western Arctic Herd has been below the Intensive Management objective of 200,000 caribou since at least 2021. We request that the department prepare an Intensive Management Feasibility Assessment to provide the board with more information about drivers of WAH population dynamics, and an evaluation of additional management strategies for growing the herd.

Currently, the harvestable surplus for the Western Arctic Herd and Teshekpuk Herd is on the lower end of the combined range for the Amount Necessary for Subsistence (ANS). If the board

determines that a reasonable opportunity for subsistence exists in accordance with state law, then TRCP believes further significant restrictions to nonresidents would be unwarranted *at this time*, especially considering the department's determination that **"the limited number of bulls harvested by nonresidents is believed to be biologically insignificant."**

If the board feels that changes to the existing management framework are necessary in 2024, we ask the board to defer action on Proposal 3 to the March 2024 Board of Game meeting in Fairbanks. That would give the few remaining transporters and guides in Unit 23 and 26A an opportunity to collaborate on potential solutions to address the board's concerns while still maintaining viable businesses and contributing to the region's rural economy for as long as nonresident harvest is biologically and legally justified.

#### **PROPOSAL 5 – OPPOSE**

The TRCP **OPPOSES** this proposal as written. While we appreciate the effort by the proponent to address concerns regarding resident and nonresident harvest, we cannot support a significant reduction in subsistence opportunity while potentially increasing nonresident opportunity. We believe a decision about resident harvest is best addressed through Proposal 2 and we maintain our position to retain existing Unit 26A seasons and bag limits due to the stable populations of the other herds in that unit. Similarly, we believe Proposal 3 is a more appropriate vehicle for considering nonresident harvest, including the potential use of strategies such as registration hunts and drawing hunts.

#### **PROPOSAL 37 – SUPPORT**

The TRCP **SUPPORTS** this proposal consistent with our rationale for Proposal 2, and for the reasons outlined by the department in its comments.

#### **PROPOSAL 38 – OPPOSE**

The TRCP **OPPOSES** this proposal to eliminate all nonresident hunting opportunities in Unit 23. Our rationale is the same as for Proposal 3. Given that a reasonable opportunity for subsistence currently exists for WAH caribou in Unit 23, further significant restrictions to nonresident harvest are unwarranted at this time. We maintain our request for the department to conduct an Intensive Management Feasibility Assessment, and also urge the board to consider the department's determination that **"the limited number of bulls harvested by nonresidents is believed to be biologically insignificant."**

If the board feels that changes to the existing management framework are necessary in 2024, we ask the board to defer action on Proposal 38 to the March 2024 Board of Game meeting in Fairbanks. That would give the few remaining transporters and guides in Unit 23 an opportunity to collaborate on potential solutions to address the board's concerns while still maintaining viable businesses and contributing to Kotzebue's rural economy for as long as nonresident harvest is biologically and legally justified.

Thank you again for the opportunity to provide these comments, and for your valuable public service.

Respectfully,

A handwritten signature in black ink that reads "Jen Leahy". The signature is written in a cursive, flowing style.

Jen Leahy  
Alaska Program Manager  
Theodore Roosevelt Conservation Partnership  
(907) 422-7635  
[jleahy@trcp.org](mailto:jleahy@trcp.org)  
Anchorage, AK





PC 596

**Name:** Thomas, Brian

**Community of Residence:** Eagle mountain, UT

**Submission Time:** 1/9/2024 2:37:22 AM

**Comment:**

To whom it may concern,

I oppose proposal 3 and 38, the closure of hunting the western arctic caribou herd to non residents as there is no scientific evidence that supports the reduction in herd numbers is related to non resident hunting. The science suggests that to improve herd numbers of any animal you need to retain females and non resident hunters are limited to male harvest and does not impact female take of caribou. There is also a natural historical fluctuation within the herd and should be expected to see these herds change. The impact that would be felt by local economies to lose the non resident influx of monies for services, lodges, and hunting guides or transporters is another factor that is important to maintaining a non resident presence of hunting.

Thank you for your consideration,

Brian Thomas

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PC 597

**Name:** Thomas, HConner

**Community of Residence:** Nome, Alaska

**Submission Time:** 1/12/2024 12:24:08 AM

**Comment:**

I oppose the adoption of Proposal 21.

The proposal would deny hunters who want to take a cow muskox and salvage a quality hide the right to do so. If adopted the proposal will force a hunter that wants to take a cow to do so when the hides are of poor quality, thus promoting the waste of a significant portion of the animal. Currently, as noted by both the proponent and the Department, there is no data indicating that the proposal would achieve its stated purpose.

The purpose of the proposal is to dissuade muskox herds from occupying areas surrounding Nome. It is predicated on the possibility that increasing hunting pressure during the fall may cause herds to move further away from town. The proponent acknowledges that the proposal may achieve its stated goal, which implies it also may not achieve that goal. No data is provided in the proposal that would support a finding that the proposal is likely to achieve its stated purpose. In fact, the limited data the Department provided indicate that the proposal is not likely to achieve that purpose:

Whether harvesting muskox near Nome in the fall months results in herds of muskox moving away from city limits or not is not well understood. The limited data the department has collected since 2021 from GPS-collared cow muskox indicates muskox do not consistently vacate an area immediately following a harvest.

Department's Response to Proposals, p. 21 (emphasis added). The Department Indicates that it is engaging in ongoing data collection regarding this issue.

As noted in the proposal, muskoxen are valued for their hide, as well as their meat. One of the reasons for the current hunting pattern is that the qiviut during the August-October time frame is "poor or non-existent." (Proposal 21, next to last paragraph.) Limiting the harvest of cows to this time frame would result in the waste of a significant portion of the value of these animals.

The proposal, if adopted, will not only result in the waste of a hide it will deprive hunters of a right they currently enjoy, which is to take a muskox of their choosing at a time of their choosing. The consequences of this proposal would be significant while the stated purpose is not currently supported by the data. The proposal should be denied.

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Proposal 21: Oppose

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**Name:** Thomas, HConner

**Community of Residence:** Nome, Alaska

**Submission Time:** 1/12/2024 12:27:40 AM

**Comment:**

Proposal 20 - Support

I support proposal 20 for the reasons provided in the proposal



PC 598

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

Proposal 20: Support

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PC 599

**Name:** Thomas, Margaret

**Community of Residence:** Nome, Alaska

**Submission Time:** 1/12/2024 12:09:58 AM

**Comment:**

See attached comments.

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

Proposal 21: Oppose

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**I strongly oppose the adoption of Proposal 21.**

- There is no data indicating that the proposal would achieve its stated purpose.
- The proposal would force hunters who want to take cows to do so when the hides are of poor quality, thus promoting the waste of a significant portion of the animal.
- The taking of cows during the August-October time-frame may have a significant impact on the survival rate of calves who continue nursing into the winter.

**There is no data to support the conclusion that Proposal 21 would achieve its goal.**

The purpose of the proposal is to dissuade muskox herds from occupying areas surrounding Nome. It is predicated on the assumption that increasing hunting pressure will cause herds to move further away from town. However, the proposal does not provide any data to support this claim and the Department's comments indicate that, in fact, it is incorrect:

Whether harvesting muskox near Nome in the fall months results in herds of muskox moving away from city limits or not is not well understood. *The limited data the department has collected since 2021 from GPS-collared cow muskox indicates muskox do not consistently vacate an area immediately following a harvest.*

Department's Response to Proposals, p. 21 (emphasis added). The Department indicates that it is engaging in ongoing data collection regarding this issue.

**Proposal 21 would encourage the taking of animals at a time when a significant portion of their value will be wasted.**

As the proposal states, muskoxen are valued for their hide, as well as their meat. One of the reasons for the current hunting pattern is that the qiviut during the August-October time-frame is "poor or non-existent." (Proposal 21, next to last paragraph.) Limiting the harvest of cows to this time-frame would result in the waste of a significant portion of the value of these animals.

**It is imperative that further investigation be conducted regarding the biological impact of the implementation of Proposal 21.**

According to a study conducted by University of Alaska, Fairbanks, Institute of Arctic Biology, muskox calves typically nurse into the middle of the winter.

Adult female muskoxen, with greater body reserves than caribou at parturition, maintain body weight throughout the summer and produce a less concentrated milk of lower quality, but undergo a substantially longer lactation period into midwinter.

This strategy may serve to maintain the female-offspring bond throughout the winter and suggests a more prolonged maternal investment by muskoxen than by caribou.

Parker, Katherine L., et al. "Comparison of energy metabolism in relation to daily activity and milk consumption by caribou and muskox neonates." *Canadian Journal of Zoology* 68.1 (1990): 106-114, accessed at [researchgate.net](https://www.researchgate.net) on January 11, 2024. The behavior of muskoxen makes it difficult, if not impossible, to identify specific cow/calf pairs. A hunter would therefore be unable to determine whether a particular cow was nursing a calf during the proposed hunting period.

... [T]he mother-infant pair shares looser spatial relationships than in other follower species. It is suggested that many characteristics of maternal-infant behaviour relate directly to the important role and effectiveness of group defense against predation in this species.

See Lent, P. C. "Maternal-infant behaviour in muskoxen." (1991): 3-22 (Summary). The taking of a nursing cow would jeopardize the survival of the calf. The effect that a cow harvest in August-October might have on the reproductive success of the herd must be assessed before Proposal 21 is adopted.

## **Conclusion**

Existing data indicates that Proposal 21 would not be effective in achieving its stated objective of reducing human/animal conflicts in the Nome area-- hunting pressure has not resulted in muskox herds vacating harvest areas. On the other hand, it would encourage the taking of animals at a time when the hide would be wasted. Most importantly, since it is known that nursing continues into the winter, it could adversely affect the health of the population in ways which have not yet been carefully studied.





PC 600

**Name:** Tibbitts, Robert

**Community of Residence:** Hurricane, UT

**Submission Time:** 1/11/2024 7:25:37 AM

**Comment:**

Dear Alaska Board of Game,

Thank you for allowing me to comment on upcoming regulatory decisions. I write this comment to express concern over non-resident caribou hunting opportunities in Alaska being completely withdrawn without due cause. I am a hunter and outdoorsman who lives in the lower 48. I hunt for many reasons, but mainly to take part in nature and have a hand in preserving a way of life that has been integral in our society since the beginning of man. I hunt to connect with nature with hopes of harvesting high quality clean organic meat for my family. I consider myself blessed to live in the United States where a common man can hunt game on public land and there is opportunity for all willing to put in the work. The vast areas of public land as well as wild animals held in public trust according to the North American Model of Wildlife Management is what has made public hunting possible.

With that said, removing hunting opportunities for non-residents completely with any scientific evidence to show that it is necessary or impactful is wrong. Excluding non-resident hunters goes against the principles of the North American Model of Wildlife Management because it preserves resources for only a select few who happen to live close to it. Furthermore, the select few who live close are allowed nearly unrestricted take of the resource. If real conservation of the resource is what is being sought, the prescribed remedies should involve managing things that have the

highest impacts on the resource first. The non-resident take of caribou for the region in question does not even account for one percent of the population and is only bulls.

Any proposal that eliminates non-resident hunting completely without evidence that such proposal would have any impact on or is necessary to preserve a game population is unfairly punitive to non-residents. I myself have not yet had the opportunity to hunt Alaska to this point in my life, I have always dreamed of coming to Alaska to hunt caribou. I respectfully ask that you consider the fact that there is no evidence that non-resident hunting of caribou is a reason for the decline of the herd and eliminating non-resident opportunity will likely not have any impact. I beg you to please not take away this opportunity.

Respectfully,

Robert Tibbitts

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Proposal 3: Oppose

Proposal 38: Oppose

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