



unapologetically **FOR ALASKAN RESIDENTS**

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May 18, 2020

To: Federal Subsistence Board via OSM  
Attn: Chris McKee  
Wildlife Division Chief  
Office of Subsistence Management  
U.S. Fish and Wildlife Service  
Anchorage, Alaska

Re: May 21, 2020 hearing on Wildlife Special Action Requests WSA 20-01, WSA 20-02, & WSA 20-03

Dear Mr. McKee and FSB members,

Resident Hunters of Alaska (RHAK) supports and advocates for a resident hunting priority for all Alaskans, no matter where they live. Under state law we are all subsistence hunters and share the same hunting traditions that put meat on our tables and feed our families.

Under the federal system, there is no option to really limit nonresident non-Alaskan hunters, which should always be the first group restricted if and when resident needs are not being met. Currently in Unit 13, with the Nelchina caribou herd within the Intensive Management population objective, nonresident Outside hunters are allocated 50 permits to hunt the Nelchina caribou herd, and over 100 permits to hunt moose in Unit 13.

These special action requests are becoming ever more prevalent and are not the wisest means to place restrictions on hunters when the nonresident component should be restricted or eliminated first. It would be preferable to use the Board of Game process to first limit nonresident non-Alaskan Outside hunters if the needs of residents are not being met.

Currently, rural residents under the Community Subsistence Hunt structure have a priority on State lands to hunt moose and caribou within Unit 13. They also already have a higher bag limit than non-fed-qualified subsistence users on federal lands within Unit 13.

**RHAK strongly opposes WSA 20-03 that asks to ban all non-federally-qualified users from hunting moose or caribou on federal lands within Unit 13.** There is no real need to restrict Alaskan residents who are not federally-qualified subsistence users from hunting moose and caribou on federal lands within Unit 13. There is ample opportunity for all hunters and the Nelchina herd is currently over the population objective and we need more harvest. Furthermore,

non-federally qualified users have a lower bag limit on federal lands than do federally-qualified users.

**RHAK opposes WSA 20-01 to lengthen the caribou season to a continuous Aug 1 – March 31 season.** The current season on federal lands in Unit 13 is Aug 1 – Sept 30 and Oct 21 – March 31. There is no need to have a continuous season, especially in the first few weeks of October when bull caribou are in rut and inedible, and when such ample opportunity is already provided.

Regarding WSA 20-02 to instigate a CSH hunt on federal lands within Units 11, 12, & 13. The current State CSH hunt structure already gives a preference to rural residents who meet the new criteria for application. There would need to be some kind of quota in order to not overharvest, similar to the State CSH hunt structure. We believe, again, there is already ample opportunity under both state and federal regulations for subsistence harvests to be met.

Thank you for the opportunity to comment,

Mark Richards  
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