

Alaska Department of Fish and Game

Staff Comments – updated 3/7/2017

Special Meeting on Copper Basin Area Moose and Caribou Hunting

Alaska Board of Game Meeting

Glennallen, Alaska

March 18-22, 2017



The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, March 18-22, 2017 in Glennallen, Alaska, and are prepared to assist the public and board. The stated staff comments should be considered preliminary and subject to change, if or when new information becomes available. Final department positions will be formulated after review of written and oral testimony presented to the board.

The attached comments were modified 3/7/17 with updated information added to Tables 15-2, 16-2, 17-2, 19-2, 24-3, 24-4, 25-4, 43-4, and 44-3.

PROPOSAL 1– 5 AAC 99.025. Customary and traditional uses of game populations. Modify the amount reasonably necessary for subsistence for moose.

PROPOSED BY: Ahtna Tene Nené.

WHAT WOULD THE PROPOSAL DO? Modify the amount reasonably necessary for subsistence (ANS) for moose by making a specific finding for that cohort of moose that do not meet antler restrictions (“any-bulls”) within the hunt area described at 5 AAC 92.074(d). The finding would be for 100 “any-bull” moose within the area for the original communities or an ANS for all communities authorized to participate in the community subsistence hunt.

WHAT ARE THE CURRENT REGULATIONS? There is a positive customary and traditional (C&T) finding for moose in Units 11, 12, and 13 (the units described in 5 AAC 92.074). Unit 11 ANS is 30–40 moose; Unit 12 ANS is 60–70 moose; and Unit 13 ANS is 300–600 moose.

The commissioner may issue community subsistence harvest permits for designated big game species in the area designated at 5 AAC 92.074(d).

- The Copper Basin Community Subsistence Harvest Hunt area includes all of Unit 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).
- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one bull moose that does not meet harvest ticket antler restrictions for every three households.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt and abide by the restrictions associated with the hunt for a period of two or more years.
- The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG, namely:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one “any-bull” locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an any-bull moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The board, department, hunters, and members of the public would have more precision in determining if reasonable opportunity for subsistence were being provided for moose that do not meet antler restrictions in the area described at 5 AAC 92.074(d). If the board adopts this proposal, a Tier II hunt for the “any-bull” component would be recommended to allocate hunting opportunity.

BACKGROUND: The board first made a positive C&T finding for moose in Unit 13 in the early 1983; this finding was affirmed in 1992. At that time, the board also accepted the department’s recommendation that 600 bull moose (based on a harvest range of 500–700) were available as a harvestable surplus. The board calculated that there were approximately 3,000 subsistence users that hunted in Unit 13, and that 600 were local residents of Unit 13. The board then concluded that the 600 moose available for harvest were needed to provide a reasonable opportunity for subsistence uses. The board also determined that at that time there was no harvestable surplus of moose available for nonsubsistence uses. The board took into consideration the federal subsistence season on federal lands within Unit 13.

In March 2009, the Board of Game modified the ANS for Unit 13 to a range of 300–600 moose. At the same meeting, the board eliminated the Tier II subsistence moose hunt which, since 1995 had awarded 150 Tier II permits for taking “any-bull” moose in Unit 13. The Tier II hunt for “any-bull” moose had replaced a registration hunt for “any-bull” moose, in place in Unit 13 from 1986 through 1989, and a subsistence drawing hunt for “any-bull” moose in the early 1980s.

The board has also found that residents of communities in the hunt area have traditionally traveled shorter distances to hunt than do non-local hunters, and have hunted for moose throughout the year. Thus, the subsistence pattern of these communities is reliant on efficient opportunities to harvest moose; in the traditional pattern, harvests occurred without regard to antler configurations. Hunting opportunities that require a specific antler configuration are designed to direct effort on a limited segment of the moose population and allow more hunters in the field in general, rather than reduce the number of hunters or

season length to prevent an overharvest. However, bag limits with antler restrictions may not provide a normally diligent participant a reasonable opportunity for success in harvesting a moose for subsistence uses because the flexibility of harvesting “any-bull” is eliminated.

In 2006-170-BOG and 2011-184-BOG, the board recognized there are two basic use patterns within a range of subsistence uses for moose in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration “any-bull” moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt in 2009. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 1-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 1-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional ‘any-bulls’ are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”) since 2009 (Table 1-2). Hunters harvested an

average of 898 moose annually during the same period which is above the current ANS for Unit 13 (Table 1-3).

Table 1-2. CSH moose harvest by unit, 2016.

	“any-bull” Quota	“any-bull” Harvest	“any-bull” Closure	Antler Legal Harvest	Total Harvest
13A WEST	0	1		32	33
13A EAST	10	8		2	10
13B	30	31	EO Sept 2	24	55
13C	18	20		4	24
13D	14	15	EO Sept 2	6	21
13E	26	38	EO Aug 24	19	57
11Z	2	1		0	1
	100	114		87	201

Table 1-3. Unit 13 moose harvest by hunt, RY2009, 2011–2016.

Regulatory Year	CM300 Harvest	GM000 Harvest	FM1301 Harvest	Drawing Permit Harvest	Total Harvest
2009	98	631	61	76	866
2011	83	724	80	65	952
2012	97	518	59	46	720
2013	156	450	50	67	723
2014	149	675	86	27	937
2015	170	765	85	30	1,050
2016	198	709	100	30	1,037 ^a

^a Harvest is not finalized.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 1-4). Harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the bull ratio observed was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 1-4. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative intent of this proposal. If adopted, the department seeks clarification if current ANS amounts would be adjusted. An option for modification could be as follows:

5 AAC 99.025 (8)

Unit 11	Positive	XX-XX moose, including XX moose that do not meet antler restrictions for other resident hunts in the community hunt area described at 5 AAC 92.074(d)
Unit 12	Positive	XX-XX moose, including XX moose that do not meet antler restrictions for other resident hunts in the community hunt area described at 5 AAC 92.074(d)
Unit 13	Positive	XXX-XXX moose, including XX moose that do not meet antler restrictions for other resident hunts in the community hunt area described at 5 AAC 92.074(d)

COST ANALYSIS: Adoption of this proposal would not result in additional direct costs for a private person to participate in these hunts, or to the department.

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PROPOSALS 2–7: 5 AAC 85.025. Hunting seasons and bag limits for caribou; and 85.045. Hunting seasons and bag limits for moose. Eliminate the community subsistence harvest hunt.

PROPOSED BY:

- Copper Basin Fish and Game Advisory Committee (Proposal 2) – Issues: enforcement, garbage, impacts other species while hunting for moose and caribou.
- Anchorage Fish and Game Advisory Committee (Proposal 3) – Issues: hunt is not meeting objectives, impacts workload of staff.
- Carl Hiers (Proposal 4) – Issue: system is being taken advantage of.
- Terry Harling (Proposal 5) – Issue: unspecified.
- Melody Callaghan (Proposal 6) – Issue: overharvest, not being used as intended.
- Travis Lamont O’Brien (Proposal 7) – Issue: hunt is difficult to maintain and is unnecessary; any bull component reporting is inaccurate, unacceptable and confusing.

WHAT WOULD THE PROPOSALS DO? Proposals 1–7 would eliminate the Copper Basin community subsistence harvest (CSH) hunts for caribou and moose and reallocate hunting opportunity.

WHAT ARE THE CURRENT REGULATIONS?

Caribou

- There is a positive C&T use finding for the Nelchina caribou herd in Unit 13 with an ANS of 600–1,000 caribou.
- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20* and October 21–March 31 with a bag limit of one caribou per household. There is no cap on the number of Tier I caribou registration permits that may be issued annually.
- Tier I Community Subsistence Harvest permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20* and October 21–March 31 with a bag limit of one caribou per household. There is no cap on the number of Tier I CSH permits that may be issued annually.
- One drawing permit hunt for caribou in Unit 13 (DC485) is available for resident hunters. Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20* and October 21–March 31 with a bag limit of one caribou.
- There is currently no nonresident hunting season for Nelchina caribou in Unit 13.
- Federal subsistence regulations provide additional opportunities for residents of Units 11, 12, 13, 20A, and 20D. Alaska residents who qualify to hunt under federal regulations can obtain a permit (FC1302) to harvest two caribou in Units 13A and 13B and two bulls in Units 13C, 13D, and 13E—a total bag limit of two caribou per hunter. The federal seasons are August 1–September 30 and October 21–March 31 throughout Unit 13.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will be bound by the conditions of the hunt.

**Note: The fall Nelchina caribou hunting season was extended by Emergency Order until September 30 for all state hunts in 2016.*

Up to 300 caribou can be taken by all CSH caribou groups combined.

CSH caribou hunt participants (recipients of CC001, and all household members) must apply as part of a community or group of at least 25 individuals and must make a two-year commitment. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.

In addition to regulations, the board has approved the following CSH hunt conditions under the department's discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board's finding at 2006-170-BOG, namely:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration caribou hunts, or hold caribou harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- After the CSH hunt has ended, if the household was unsuccessful in filling the CSH bag limit during the CSH hunt, household members may hunt in areas outside the CSH hunt area with caribou harvest tickets or other state caribou permits where the bag limit is greater than one caribou per household.
- No member of the household may hunt moose outside of the CSH hunt area.
- Any member of the household may harvest the caribou, and any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the heart, liver, kidneys, and fat, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Prior to October 1, meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by Emergency Order to one bull or one cow, or the hunt may be closed by Emergency Order.

Moose

- The Board of Game has made a positive C&T finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T finding for moose in Unit 13, with an ANS of 300–600 moose.
- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1-31 (CM301). The board has established an allocation of 100 “any-bull” moose (bull moose that do not meet harvest ticket antler restrictions) for the fall CSH season. Once the 100 “any-bull” allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side (three or more brow tines in Unit 11). Each CSH group has a bag limit of one “any-bull” for every three households.

- Resident hunters with harvest tickets may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters may also apply for a drawing permit hunt for one antlerless moose (no take of calves or cows accompanied by a calf; DM325). Open season for DM325 is October 1–31 and March 1–31, and up to 200 permits may be issued. Ten permits were issued in 2016.
- Resident hunters may also apply for a drawing permit for one bull (DM324), with an open season of September 1–20. Up to five permits may be issued, and all five permits were issued in 2016.
- A winter registration hunt (RM319) and a winter CSH hunt (CM301) to take one bull from December 1–31 were also authorized by the Board of Game, but have not been implemented by the department since 2014 due to concerns about high levels of participation and our ability to manage the hunt within biologically sustainable limits.
- Nonresidents with a drawing permit (DM335–DM339) are allowed to hunt for one bull with 50-inch antlers or antlers with four or more brow tines. Up to 150 permits may be issued, and 115 permits were issued in 2016.
- Federal subsistence regulations provide additional opportunity for residents of Units 12, 13, 20A, and 20D. Alaska residents who qualify to hunt under federal regulations can obtain a permit (FM1301) to harvest one antlered bull per household in Unit 13E or one antlered bull per person in the remainder of Unit 13. The federal season is August 1–September 20.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will be bound by the conditions of the hunt. CSH moose hunt participants (recipients of CM300, and all household members) must apply as part of a community or group of at least 25 individuals and must make a two-year commitment. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG, namely:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in

their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.

- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? The board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation, and community hunts in the Copper Basin Subsistence hunt area would not be available. Moose and caribou hunting opportunities would only be provided for the individual pattern of use through harvest ticket, registration, and drawing opportunities.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose and caribou hunts to provide a reasonable opportunity for the community-based pattern in addition to other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community.

Caribou

In March 2009 the board established the current ANS of 600–1,000 caribou for the Nelchina caribou herd (NCH). When the Nelchina harvest quota is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus comprises resident-only hunts, including Tier I hunts (Copper Basin CSH hunt CC001, and Tier I registration hunt RC566) and drawing permit hunts. The board has not established a harvest quota threshold that would allow nonresident hunting opportunity when the threshold is exceeded.

Since 2009, the NCH has increased in population size and the combined harvest has not reached the established CSH quotas in recent years, despite increases in participation. The department currently issues the maximum number of permits for the drawing hunt annually (5,000 drawing permits). Participation in the CSH hunt has also increased (Table 2-1); however the bag limit is limited to a maximum of 300 caribou, which has not been reached since this cap was established.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009. Nonresident hunting opportunity has not been offered since 1981. The number of CSH caribou hunting harvest tickets/reports issued annually has increased from 477 in 2009 to 1,011 in 2016 (Table 2-2). Similarly, the number of Tier I registration permits (RC566) issued annually also increased from 500 in 2009 to 8,470 in 2016. Also in 2016, the department increased the number of drawing permits issued to

5,000 permits in an attempt to reach the harvest quota and keep the caribou population within management objectives. It should be noted that not every permit or harvest ticket/report equates to a hunter in the field, or hunter success (Table 2-1).

The management objective for the NCH is to maintain a population between 35,000 and 40,000 animals. A minimum count of the Nelchina herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

Prior to the establishment of the CSH in 2009, subsistence hunting of Nelchina caribou in Unit 13 was allocated through a registration hunt open only to local residents or a Tier II hunt (most years from 1990–2008). Other hunting opportunity was allocated through a drawing hunt (1983–1989).

Table 2-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 Tier II permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15.

^d Harvest is ongoing.

Table 2-2. Nelchina caribou CSH participants in regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Towns Represented	Number of Households	Number of Individual Participants
2009	1	19	477	-
2010 ^a	-	-	-	-
2011	6	31	322	636
2012	17	29	402	824
2013	28	41	687	1,424
2014	25	38	569	1,121
2015	26	44	659	1,359
2016	45	49	1,011	2,272

^a The community hunt was not offered in regulatory year 2010.

Moose

In March 2009, the board established the current ANS of 300–600 moose in Unit 13. The board developed the current hunt structure for resident moose hunting opportunity with an earlier starting date for the CSH hunt. Board finding 2015-209-BOG recommends that the department establish individual quotas for each subarea of the Copper Basin community subsistence hunt for the moose that do not meet harvest ticket antler restrictions in Units 11 and 13, and that the department should attempt to achieve the quota for each subarea regardless of whether or not the total harvest exceeds the total allocation for the CSH program.

Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 2-3). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

CSH hunters have harvested an average of 137 moose annually, including, since 2009, an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”). Hunters harvested an average of 898 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season when the any-bull hunting opportunity is available (Figure 2-1).

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 2-4). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the bull ratio observed was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 2-3. Participation and harvest in the CSH moose hunts in Units 11, 13 and a portion of Unit 12 in regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
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2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

Table 2-4. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

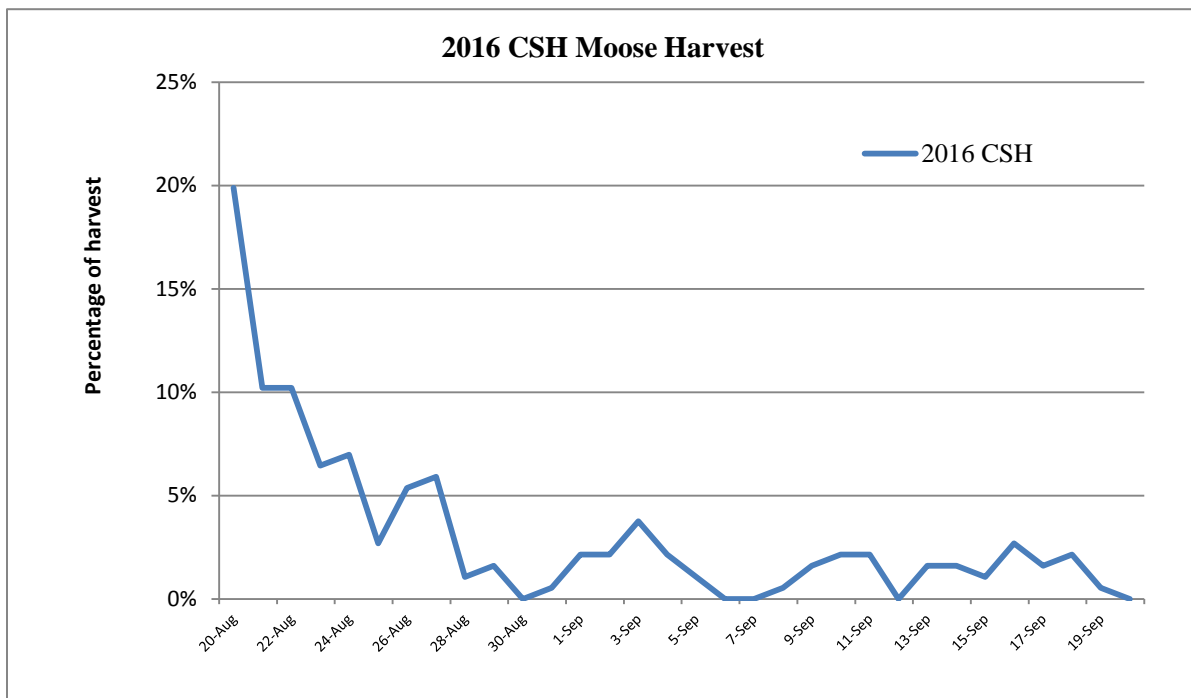


Figure 2-1. Moose harvest chronology in the CSH, RY2016.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of caribou and moose harvest in the Copper Basin Subsistence hunt area. If adopted, the board should consider whether reasonable opportunity for success in harvesting a moose or caribou for the communal pattern of use still exists, as well as overall reasonable opportunity for subsistence uses of moose and caribou in Units 11, 12, and 13.

COST ANALYSIS: Adoption of these proposals is not expected to result in additional costs to the department.



PROPOSALS 8–13: 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY:

- Denali Fish and Game Advisory Committee (Proposal 8) – Issues: hunt is hard to maintain and unnecessary.
- Dylan Berg (Proposal 9) – Issues: over-crowding and over-harvest.
- Lee Adler (Proposal 10) – Issue: competition with non-local hunters.
- Ronald Faulkner (Proposal 11) – Issue: over-harvest and unfair advantage for CSH hunters.
- Adam Durland (Proposal 12) – Issue: allocation or over-harvest.
- Travis Price (Proposal 13) – Issue: hunters are only joining CSH to avoid regular antler restrictions and to have longer seasons.

WHAT WOULD THE PROPOSALS DO? These proposals would eliminate the community subsistence harvest hunt for moose and reallocate opportunity.

WHAT ARE THE CURRENT REGULATIONS?

- The Board of Game has made a positive C&T finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T finding for moose in Unit 13 with an ANS of 300–600 moose.
- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).
- Resident hunters with CSH harvest reports may harvest one bull moose from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one “any-bull” for every three households.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will still need to comply with the conditions of the CSH hunt.
- All Copper Basin CSH applicants and their household members must make a two-year commitment.
- In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-

BOG, namely No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.

- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? The board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation, and the community moose hunt (CM300) would be eliminated as a hunt option for moose in Unit 13. The CSH “any-bull” quota could be allocated under alternative hunt structures.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration “any-bull” moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 8-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 8-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^bEmergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^cAdditional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including, since 2009, an average of 81 bulls that do not meet harvest ticket antler restrictions (any-bull). Hunters harvested an average of 898 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season concurrent with the “any-bull” hunting opportunity (Figure 8-1).

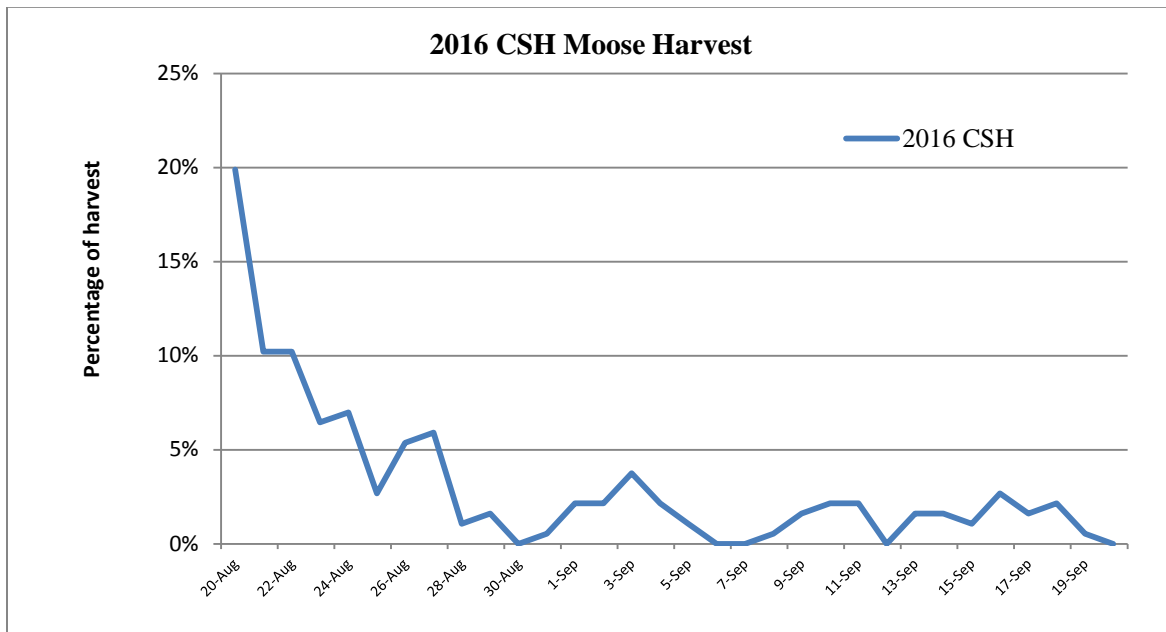


Figure 8-1. CSH moose harvest chronology, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 8-2). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the observed bull ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 8-2. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose harvest in the CSH hunt. If adopted, the board should consider whether reasonable opportunity for success in harvesting a moose or caribou for the communal pattern of use still exists, as well as overall reasonable opportunity for subsistence uses of moose and caribou in Units 11, 12, and 13. The current CSH “any-bull” quota could be allocated under alternative hunt structures if so desired.

COST ANALYSIS: Adoption of these proposals is not expected to result in additional costs to the department.

PROPOSAL 14 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Matanuska Valley Fish and Game Advisory Committee

WHAT WOULD THE PROPOSAL DO? Eliminate the community subsistence harvest (CSH) hunt and the December registration hunt for moose in Unit 13 and modify the number of available drawing permits. The proposal also recommends that the number of nonresident drawing permits be decreased, and the number of resident “any bull” drawing permits issued would be increased to 100 permits annually.

WHAT ARE THE CURRENT REGULATIONS? The Board of Game has made a positive C&T use finding for moose in Unit 13 with an ANS of 300–600 moose. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- CSH participants have a bag limit of one bull from August 10–September 20 (CM300) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the Copper Basin CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group is limited to one any-bull for every three households.
- Resident hunters with harvest tickets for Unit 13 may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters who successfully draw a Unit 13 bull moose drawing permit (DM324) are permitted one bull from September 1–20; up to 5 permits may be issued.

- Resident hunters who successfully draw a Unit 13 antlerless moose drawing permit (DM325) are allowed to harvest one antlerless moose from October 1–31 or March 1–31; up to 200 permits may be issued.
- Federally qualified subsistence users can obtain a federal moose permit (FM1301). The season is August 1–September 20 with a bag limit of one antlered bull moose per household for residents that qualify for 13E, or one antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal lands only.
- Nonresident hunters who successfully draw a Unit 13 drawing permit (DM335–DM339) are permitted one bull with 50-inch antlers or antlers with four or more brow tines on one side from September 1–20; up to 150 permits may be issued.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off)
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will still need to comply with the conditions of the CSH hunt.
- All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt and abide by the restrictions associated with the hunt for a period of two or more years.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG, namely

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH hunts (CM300 and CM301) would be eliminated as hunt options for moose in Unit 13, and the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. It is unclear if the proposal also seeks to eliminate the CSH hunt in Units 11 and 12, and the CSH caribou

hunt. The board would still be providing for the individual pattern of use, and the available resident any-bull drawing permits would be increased from 5 to 100, and the non-resident drawing permits available for issue would be decreased from 150 to 100. This proposal reallocates the “any bull” hunting opportunity, but it should be noted that drawing permits do not provide subsistence hunting opportunity.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions) and the winter registration “any-bull” moose hunt.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 14-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 14-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^a The community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”) since 2009. Hunters harvested an average of 898 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 14-1).

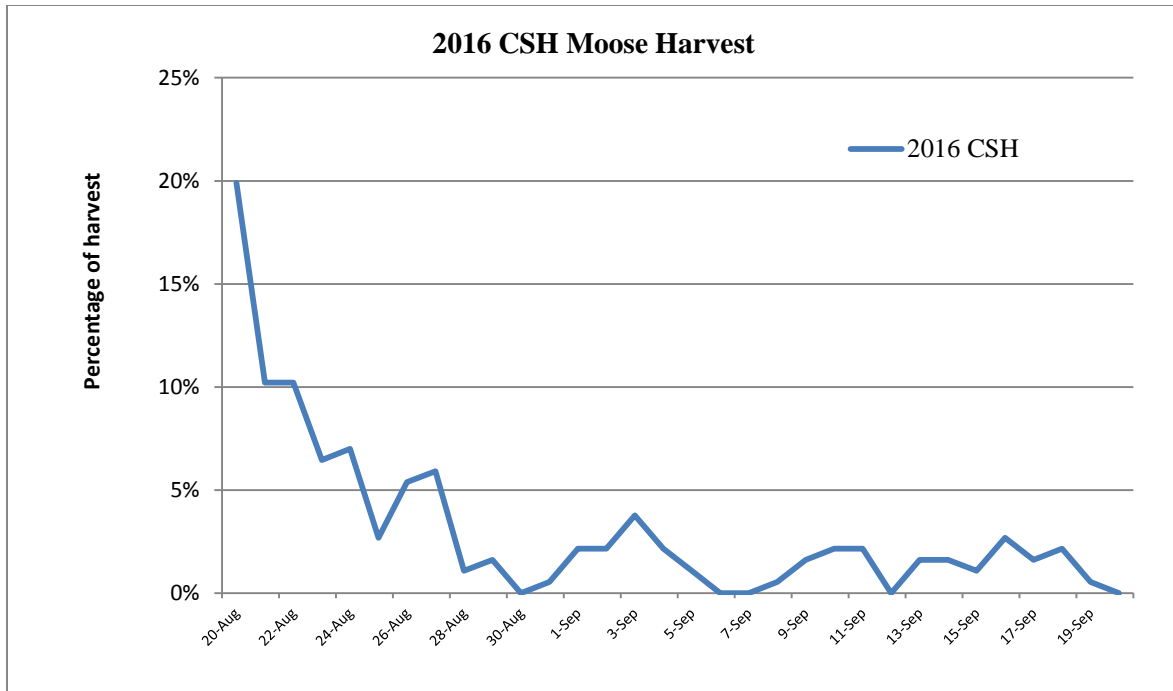


Figure 14-1. Moose harvest chronology in the CSH, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 14-2). Current harvests have been increasing in recent years though harvest does not appear to be having an adverse effect on bull:cow ratios, however, one exception may be in 13A, where the observed bull ratio was 20 bulls:100 cows in 2016. This ratio is expected to improve with changes in hunt management and administration.

Table 14-2. Unit 13 moose population objectives and 2015 estimates

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose harvest in the Copper Basin subsistence hunt area. If adopted, the board should consider whether reasonable opportunity for success in harvesting a moose or caribou for the communal pattern of use still exists, as well as overall reasonable opportunity for subsistence uses of moose and caribou in Units 11, 12, and 13. Increasing the number of resident any-bull drawing permits that can be issued and decreasing the number of non-resident drawing permits that can be issued are not expected to affect the overall moose harvest or population composition in Unit 13.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 15: 5 AAC 85.045. Hunting seasons and bag limits for moose. Eliminate the community subsistence harvest hunts or change season dates and eliminate “any-bull” tags.

PROPOSED BY: Casey Allik

WHAT WOULD THE PROPOSAL DO? Eliminate the CSH hunt for moose or align the CSH opening day with the harvest ticket moose opening date (September 1; also the opening date of DM324, and nonresident DM335–339) and eliminate the “any-bull” tags.

WHAT ARE THE CURRENT REGULATIONS?

- The Board of Game has made a positive C&T use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 13 with an amount necessary for subsistence of 300–600 moose.
- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).
- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one bull moose that does not meet harvest ticket antler restrictions for every three households.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt and abide by the restrictions associated with the hunt for a period of two or more years.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but still need to comply with the conditions of the CSH hunt.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG, namely

No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.

- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose hunt (CM300) would be eliminated as a hunt option for moose in Unit 13, and the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. Alternatively, the CSH moose season opener would be aligned with most Unit 13 moose hunting opportunities (September 1). This would reduce the CSH moose season by 12 days. There would be no opportunity to harvest a moose without antler restrictions other than resident drawing hunts DM324 or DM325 unless the winter registration hunt is implemented.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration “any-bull” moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 15-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 15-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^bEmergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^cAdditional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including, since 2009, an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”). Hunters harvested an average of 898 moose annually during the same period. Of the 73 CSH groups in 2016, 61 groups successfully harvested moose, with an average harvest of three moose per group. Residents of Unit 13 harvested 13 (11.7%) of those “any-bull”, while residents of other Alaskan communities harvested 98 (88.3%) of those “any-bull” (Table 15-2).

Table 15-2. CSH any-bull moose harvests by hunter residency, 2009–2016.

Year	Residency of hunter				Total any-bull harvest ^a
	Unit 13		Other Alaska		
	Number of any-bulls harvested	Percent of any-bull harvest	Number of any-bulls harvested	Percent of any-bull harvest	
2009	66	97.1%	2	2.9%	68
2010	<i>The community hunt was not offered in regulatory year 2010</i>				
2011	39	66.1%	20	33.9%	59
2012	23	31.5%	50	68.5%	73
2013	11	13.6%	70	86.4%	81
2014	16	20.8%	61	79.2%	77
2015	23	25.0%	69	75.0%	92
2016	14	14%	100	87.7%	114

^aAdditional “any-bulls” are harvested in the area under federal permits.

Table updated 3/7/2017.

Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 15-1).

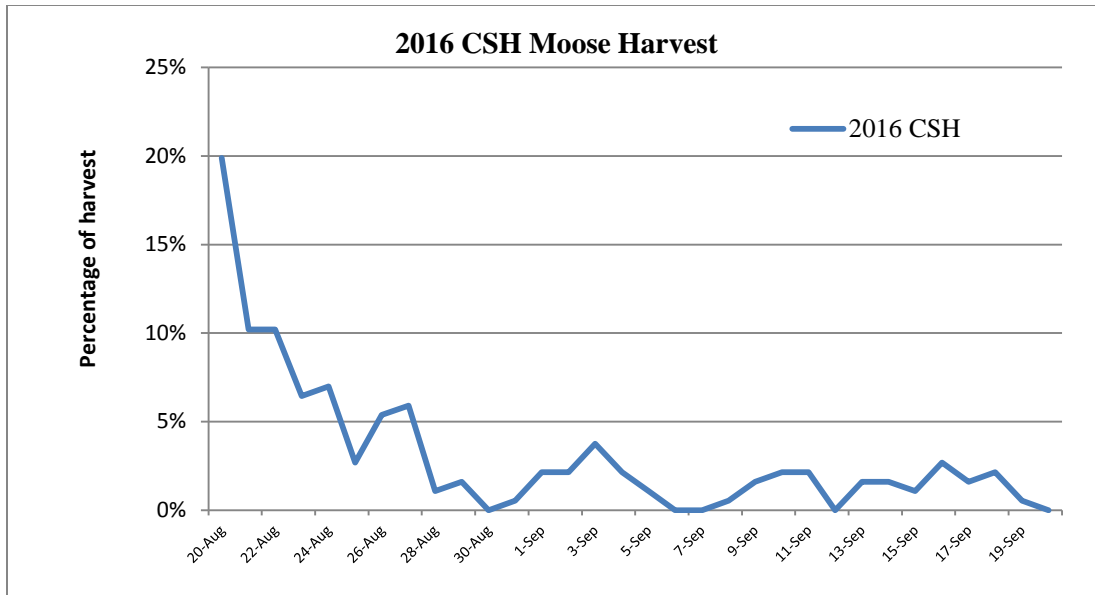


Figure 15-1. Moose harvest chronology in the CSH, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 15-3). Current harvests have been increasing in recent years; however harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in Unit 13A where the observed bull ratio was 20 bulls:100 cows in 2016. This ratio is expected to improve with changes in hunt management and administration.

Table 15-3. Unit 13 moose population objectives and 2015 estimates

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose hunting opportunity specified in this proposal. If adopted, the board should consider whether reasonable opportunity for success in harvesting a moose for the communal pattern of use still exists, as well as overall reasonable opportunity for subsistence uses of moose in Units 11, 12, and 13.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 16- 5 AAC 85.045. Hunting seasons and bag limits for moose; and 92.072. Community subsistence harvest hunt area and permit conditions. Eliminate the community subsistence harvest moose hunt or modify the season and bag limits.

PROPOSED BY: George Pederson

WHAT WOULD THE PROPOSAL DO? Eliminate the CSH hunt for moose or align the CSH opening day with the harvest ticket moose open season (September 1) and restrict the bag limit to one moose per CSH group. If the CSH was retained, harvested moose meat would be distributed by the group coordinator.

WHAT ARE THE CURRENT REGULATIONS?

- The Board of Game has made a positive C&T use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 13 with an amount necessary for subsistence of 300–600 moose.
- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).
- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one bull moose that does not meet harvest ticket antler restrictions for every three households.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but still need to comply with the conditions of the CSH hunt.
- All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt for a period of two or more years.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG, namely

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose hunt (CM300) would be eliminated as a hunt option for moose in Unit 13 and the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. Alternatively, the CSH moose season would begin on September 1, with a bag limit of one moose per CSH group. This would be a reduction in the CSH moose season by 12 days, and a reduction in moose harvest. A shortened season would decrease moose hunting opportunity for CSH hunters, and the one moose per group bag limit would likely decrease harvest.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions) and the winter registration “any-bull” moose hunt.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 16-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 16-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^bEmergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^cAdditional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including, since 2009, an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”). Hunters harvested an average of 898 moose annually during the same period. Of the 73 CSH groups in 2016, 61 groups successfully harvested moose, with an average harvest of three moose per group. Residents of Unit 13 harvested 13 (11.7%) of those “any-bull”, while residents of other Alaskan communities harvested 98 (88.3%) of those “any-bull” (Table 16-2).

Table 16-2. CSH any-bull moose harvests by hunter residency, 2009–2016.

Year	Residency of hunter				Total any-bull harvest ^a
	Unit 13		Other Alaska		
	Number of any-bulls harvested	Percent of any-bull harvest	Number of any-bulls harvested	Percent of any-bull harvest	
2009	66	97.1%	2	2.9%	68
2010	<i>The community hunt was not offered in regulatory year 2010</i>				
2011	39	66.1%	20	33.9%	59
2012	23	31.5%	50	68.5%	73
2013	11	13.6%	70	86.4%	81
2014	16	20.8%	61	79.2%	77
2015	23	25.0%	69	75.0%	92
2016 ^b	14	14%	100	87.7%	114

^aAdditional “any-bulls” are harvested in the area under federal permits.

^bHarvest data is not finalized

Table updated 3/7/2017.

Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 16-1).

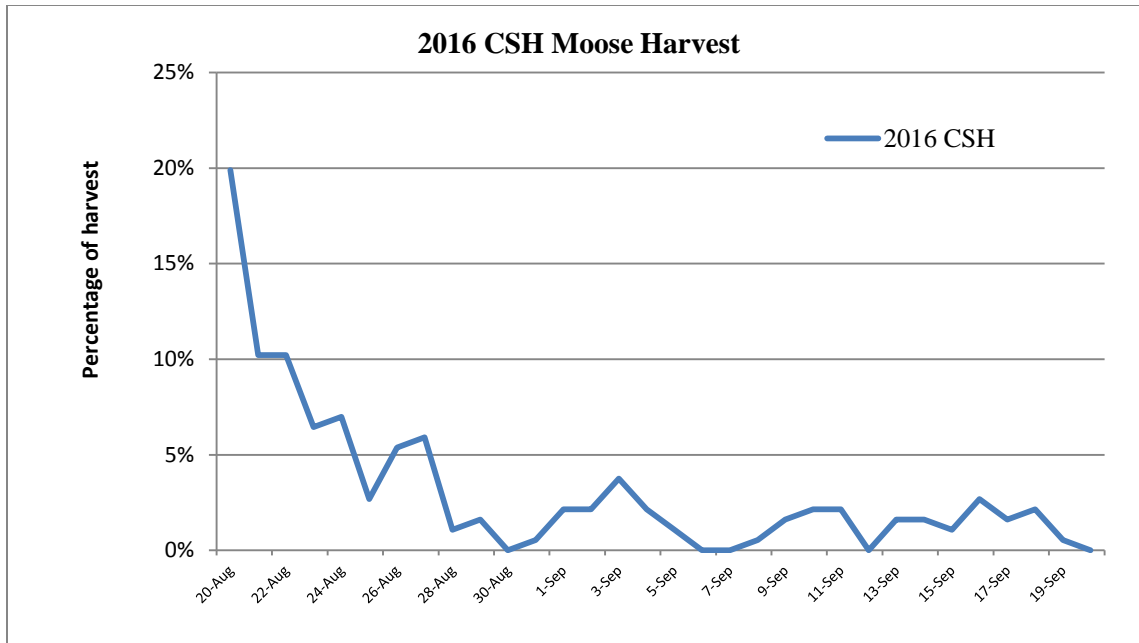


Figure 16-1. Moose harvest chronology in the CSH, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 16-3). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the observed bull ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 16-3. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose within the CSH hunt. If adopted, the board should consider whether reasonable opportunity for success in harvesting a moose for the communal pattern of use still exists, as well as overall reasonable opportunity for subsistence uses of moose in Units 11, 12, and 13. If the CSH moose hunt were eliminated, moose hunting opportunities would likely be provided through existing harvest ticket (antler restricted) and drawing opportunities.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 17– 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the season dates for the community subsistence harvest moose hunt.

PROPOSED BY: Jeffery Berg

WHAT WOULD THE PROPOSAL DO? Change the CSH moose season from August 20–September 20 to November 15–November 20 or by emergency order.

WHAT ARE THE CURRENT REGULATIONS?

- The Board of Game has made a positive C&T use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 13 with an amount necessary for subsistence of 300–600 moose.
- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).
- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one bull moose that does not meet harvest ticket antler restrictions for every three households.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member. All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt for a period of two or more years.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will still need to comply with the conditions of the CSH hunt.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.

- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose (CM300) season would change from August 20–September 20 to November 15–November 20, decreasing the CSH moose season from 32 days to six days.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include a harvest ticket moose hunt (with antler restrictions), the winter registration “any-bull” moose hunt, and drawing hunts for antlerless moose (DM325) and bull moose (DM324).

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 17-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 17-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^bEmergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^cAdditional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including, since 2009, an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”). Hunters harvested an average of 898 moose annually during the same period. Of the 73 CSH groups in 2016, 61 groups successfully harvested moose, with an average harvest of three moose per group. Residents of Unit 13 harvested 13 (11.7%) of those “any-bull”, while residents of other Alaskan communities harvested 98 (88.3%) of those “any-bull” (Table 17-2).

Table 17-2. CSH any-bull moose harvests by hunter residency, 2009–2016.

Year	Residency of hunter				Total any-bull harvest ^a
	Unit 13		Other Alaska		
	Number of any-bulls harvested	Percent of any-bull harvest	Number of any-bulls harvested	Percent of any-bull harvest	
2009	66	97.1%	2	2.9%	68
2010	<i>The community hunt was not offered in regulatory year 2010</i>				
2011	39	66.1%	20	33.9%	59
2012	23	31.5%	50	68.5%	73
2013	11	13.6%	70	86.4%	81
2014	16	20.8%	61	79.2%	77
2015	23	25.0%	69	75.0%	92
2016	14	14%	100	87.7%	114

^aAdditional “any-bulls” are harvested in the area under federal permits.

Table updated 3/7/2017.

Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 17-1).

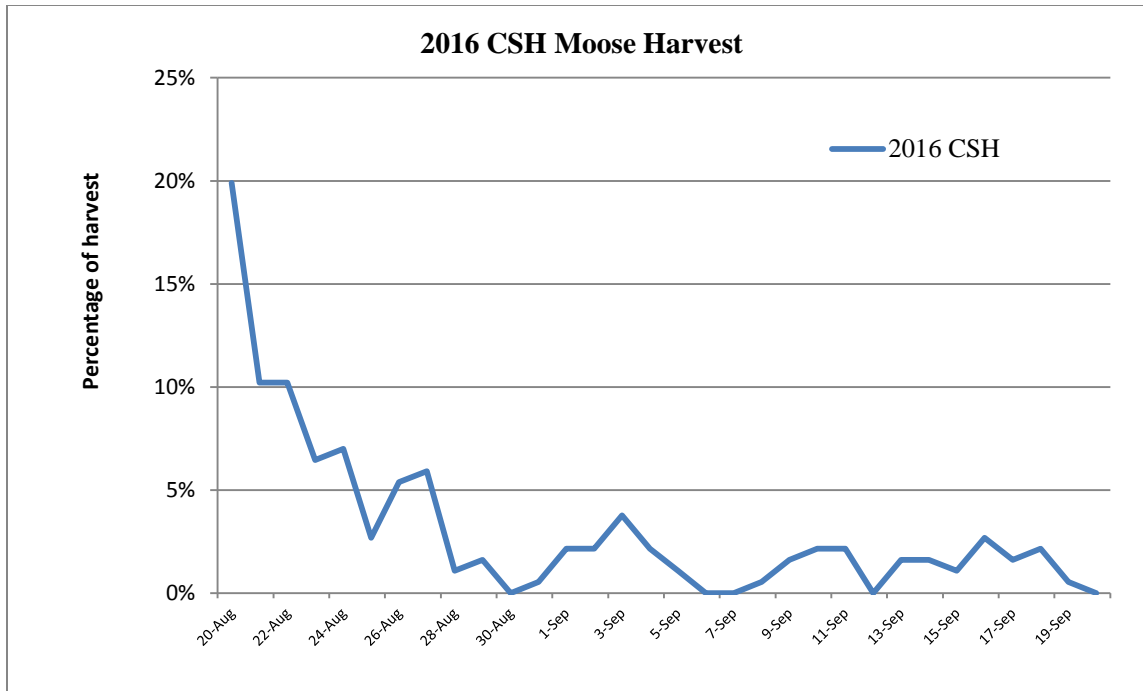


Figure 17-1. Moose harvest chronology in the CSH, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 17-3). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the observed bull ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 17-3. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose within the CSH hunt. If adopted, moose hunting opportunity for CSH hunters would be reduced considerably and there would only be six days to harvest a moose. The board will need to determine if a hunt with this length in season provides reasonable opportunity for success in harvesting moose in Units 11, 12, and 13 for subsistence purposes.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 18 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Eliminate or change season dates of the community subsistence harvest moose hunt.

PROPOSED BY: Vern Cordell

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the CSH hunt or modify the season dates so the hunt opens after the harvest ticket hunt. The proposal does not offer a suggestion for when the new opening would occur if the season dates are modified.

WHAT ARE THE CURRENT REGULATIONS?

- The Board of Game has made a positive C&T use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 13 with an amount necessary for subsistence of 300–600 moose.
- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).
- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one bull moose that does not meet harvest ticket antler restrictions for every three households.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- The group coordinator must submit an annual Coordinator Community Harvest Report, on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will still need to comply with the conditions of the CSH hunt.
- All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt for a period of two or more years.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or

attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board's finding at 2006-170-BOG.

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Unit 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an "any-bull" moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the forequarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose hunt (CM300) would be eliminated as a hunt option for moose in Unit 13 and the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. Alternatively, the season dates would be changed to open after the harvest ticket and drawing hunts. It is not clear if the intent is to have the opening date of the CSH hunt occur after the harvest ticket and drawing hunts open or if the CSH hunt is to open after those hunts close. If the CSH season dates were shifted to later in the season, CSH hunters would likely be hunting during the rut period.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) "the community-based pattern established by the Ahtna" (2006-170-BOG). The board recognized that the community-based pattern has been "adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents."

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration "any-bull" moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 18-1). In 2009 there was one CSH moose group with

378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 18-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^a The community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including an average of 81 bulls that do not meet harvest ticket antler restriction (“any-bull”) since 2009. Hunters harvested an average of 898 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 18-1).

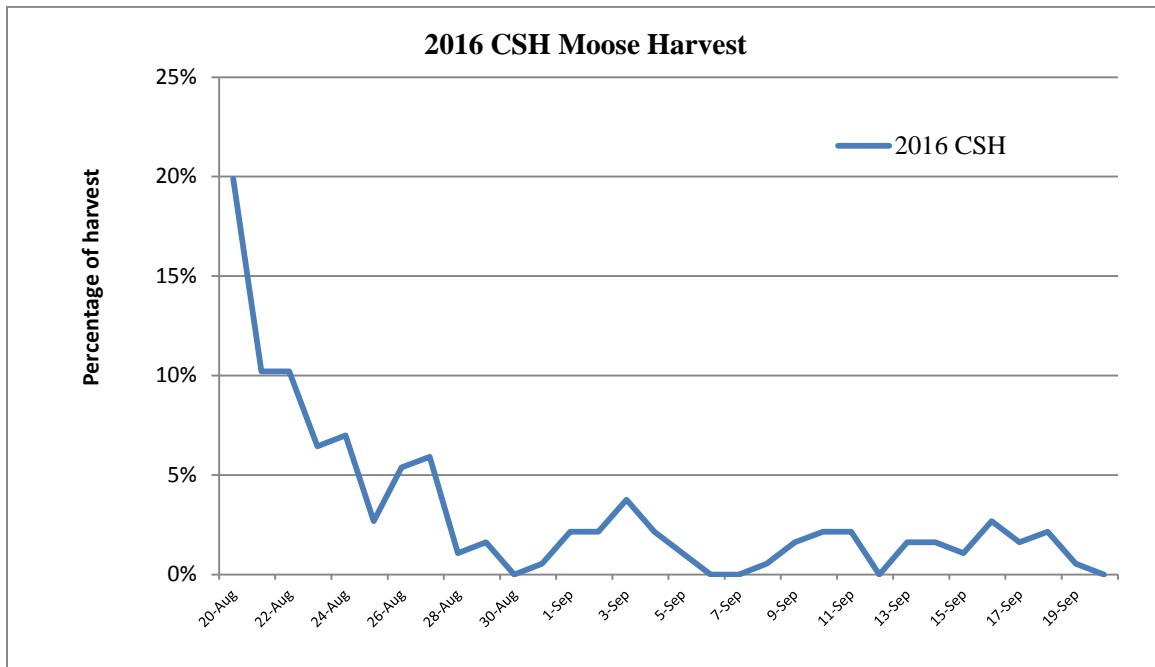


Figure 18-1. Moose harvest chronology in the CSH, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 18-2). Current harvests have been increasing in recent years though harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the observed bull ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 18-2. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose harvest within the CSH hunt. If the CSH hunt is eliminated, the board should consider whether reasonable opportunity for success in harvesting a moose for the communal pattern of use still exists, as well as overall reasonable opportunity for subsistence uses of moose in Units 11, 12, and 13. If the season dates were changed, the board will need to determine if the proposed hunt will continue to provide reasonable opportunity of success in harvesting moose in Units 11, 12, and 13 for subsistence purposes. If the CSH hunt season dates are changed to open after the hunt, the overall moose harvest in Unit 13 is not expected to be affected.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 19- 5 AAC 85.045. Hunting seasons and bag limits for moose; 92.050. Required permit hunt conditions and procedures; and 92.052. Discretionary permit conditions and procedures.

Modify the community subsistence harvest moose hunts.

PROPOSED BY: Dan Berg

WHAT WOULD THE PROPOSAL DO? Change the CSH moose season from August 20–September 20 to August 10–August 25, prohibit CSH moose hunters from hunting during the harvest ticket or DM324 hunt seasons (September 1–September 20), and require the destruction of trophy value of moose antlers harvested during the CSH season. Alternatively, allocate more moose to the drawing hunts and eliminate the CSH hunt.

WHAT ARE THE CURRENT REGULATIONS?

- The Board of Game has made a positive C&T use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 12, and found that 60–70 moose are reasonably

necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 13 with an amount necessary for subsistence of 300–600 moose.

- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).
- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one bull moose that does not meet harvest ticket antler restrictions for every three households.
- Each community group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will still need to comply with the conditions of the CSH hunt. All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt for a period of two or more years.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG, namely:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.

- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose hunt (CM300) would be eliminated as a hunt option for moose in Unit 13 and the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. Eliminating the CSH hunt and reallocating to the drawing hunts would reallocate opportunity to the individual pattern of use. Alternatively, changing the season as proposed would significantly decrease the CSH moose season, from 32 days to 16 days. Bull moose harvested in the CSH would need to have the trophy value of their antlers destroyed before leaving the field.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna”(2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a “community.” Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration “any” bull moose hunt, and drawing hunts. DM300 does not exist and DM325 is an antlerless hunt.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 19-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 19-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including, since 2009, an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”). Hunters harvested an average of 898 moose annually during the same period. Of the 73 CSH groups in 2016, 61 groups successfully harvested moose, with an average harvest of three moose per group. Residents of Unit 13 harvested 13 (11.7%) of those “any-bull”, while residents of other Alaskan communities harvested 98 (88.3%) of those “any-bull” (Table 19-2).

Table 19-2. CSH any-bull moose harvests by hunter residency, 2009–2016.

Year	Residency of hunter				Total any-bull harvest ^a
	Unit 13		Other Alaska		
	Number of any-bulls harvested	Percent of any-bull harvest	Number of any-bulls harvested	Percent of any-bull harvest	
2009	66	97.1%	2	2.9%	68
2010	<i>The community hunt was not offered in regulatory year 2010</i>				
2011	39	66.1%	20	33.9%	59
2012	23	31.5%	50	68.5%	73
2013	11	13.6%	70	86.4%	81
2014	16	20.8%	61	79.2%	77
2015	23	25.0%	69	75.0%	92
2016	14	14%	100	87.7%	114

^a Additional “any-bulls” are harvested in the area under federal permits.

Table updated 3/7/2017.

Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 19-1).

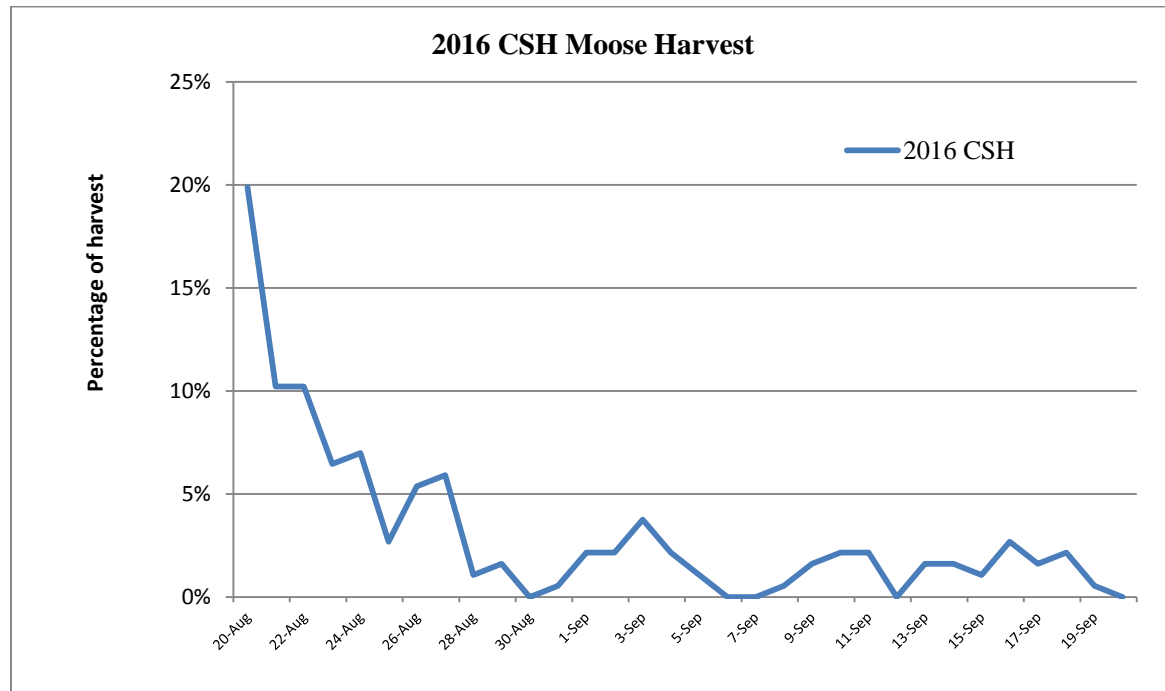


Figure 19-1. Moose harvest chronology in the CSH, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 19-3). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the observed bull ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 19-3. Unit 13 moose population objectives and 2015 estimates

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose within the CSH hunt and on trophy destruction requirements. If the CSH is eliminated, the board should consider whether reasonable opportunity for success in harvesting a moose for the communal pattern of use still exists. If the season dates were changed, or CSH hunters prohibited from continuing to hunt for moose with antler restrictions, the board will need to determine if the proposed hunt will continue to provide reasonable opportunity of success in harvesting moose in Units 11, 12, and 13 for subsistence purposes.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 20: 5 AAC 85.045. Hunting seasons and bag limits for moose. Replace the community subsistence harvest hunt for moose with a Tier II moose season.

PROPOSED BY: Van Putman

WHAT WOULD THE PROPOSAL DO? Eliminate the CSH for moose and replace it with a Tier II moose hunt.

WHAT ARE THE CURRENT REGULATIONS?

- The Board of Game has made a positive C&T use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 13 with an amount necessary for subsistence of 300–600 moose.
- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).

- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one bull moose that does not meet harvest ticket antler restrictions for every three households.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will still need to comply with the conditions of the CSH hunt.
- All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt and abide by the restrictions associated with the hunt for a period of two or more years.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG. No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.

- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one “any-bull” locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose hunt (CM300) would be eliminated as a hunt option for moose in Unit 13 and the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. Instead, hunting opportunity would be allocated to the individual pattern of use through a Tier II structure

with the same season dates. Tier II hunters would be allocated 100 permits (one per household) for “any-bull”. Tier II hunters who did not win “any-bull” permits would be restricted to Unit 13 harvest ticket antler restrictions.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna”(2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration “any-bull” moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 20-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 20-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including an average of 81 bulls that do not meet harvest ticket antler restriction (“any-bull”) since 2009. Hunters harvested an average of 898 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 20-1).

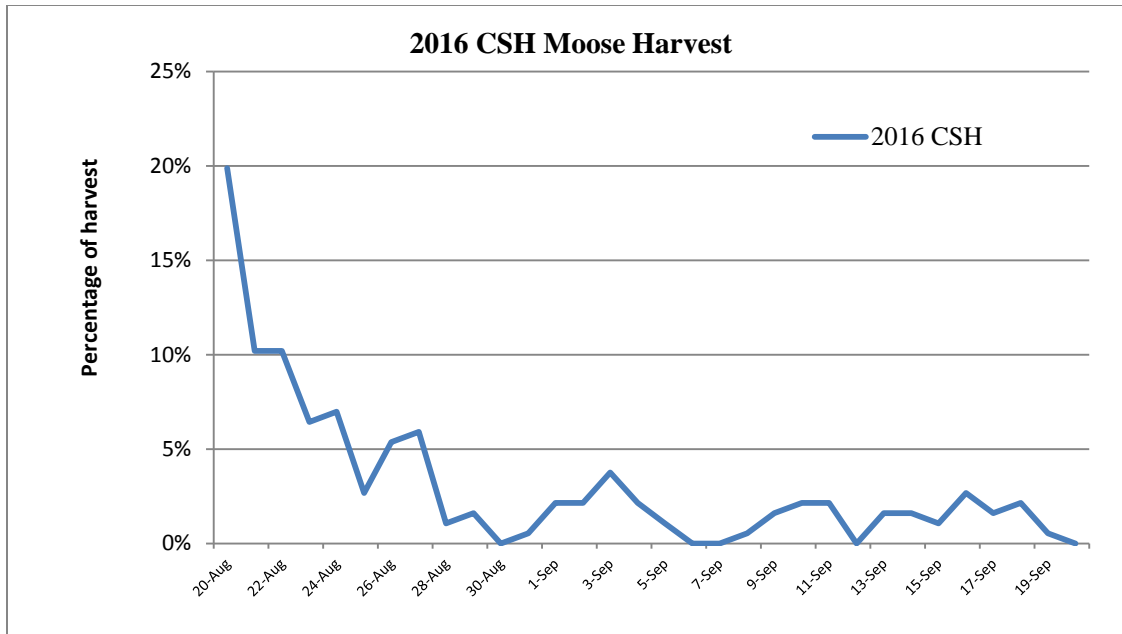


Figure 20-1. Moose harvest chronology in the CSH, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 20-2). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the observed bull ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 20-2. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose harvest in Units 11, 12, and 13. If the CSH is eliminated, the board should consider whether reasonable opportunity for success in harvesting a moose or caribou for the communal pattern of use still exists.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 21: 5 AAC 85.045. Hunting seasons and bag limits for moose. Eliminate the community subsistence harvest moose hunts, and replace with a Tier II or registration moose season.

PROPOSED BY: James Holmes

WHAT WOULD THE PROPOSAL DO? Eliminate the CSH hunt for moose and replace with a Tier II or registration moose hunt.

WHAT ARE THE CURRENT REGULATIONS?

- The Board of Game has made a positive C&T use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 13 with an amount necessary for subsistence of 300–600 moose.
- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).
- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one bull moose that does not meet harvest ticket antler restrictions for every three households.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will still need to comply with the conditions of the CSH hunt.
- All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt for a period of two or more years.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG.

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).

- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose hunt (CM300) would be eliminated as a hunt option for moose in Unit 13 and the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. The CSH would be replaced by a Tier II or registration hunt structure and the opportunity reallocated to the individual pattern of use. Under the registration hunt option, registration would be conducted locally.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna”(2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration “any-bull” moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 21-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 21-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b

2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”) since 2009. Hunters harvested an average of 898 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 21-1).

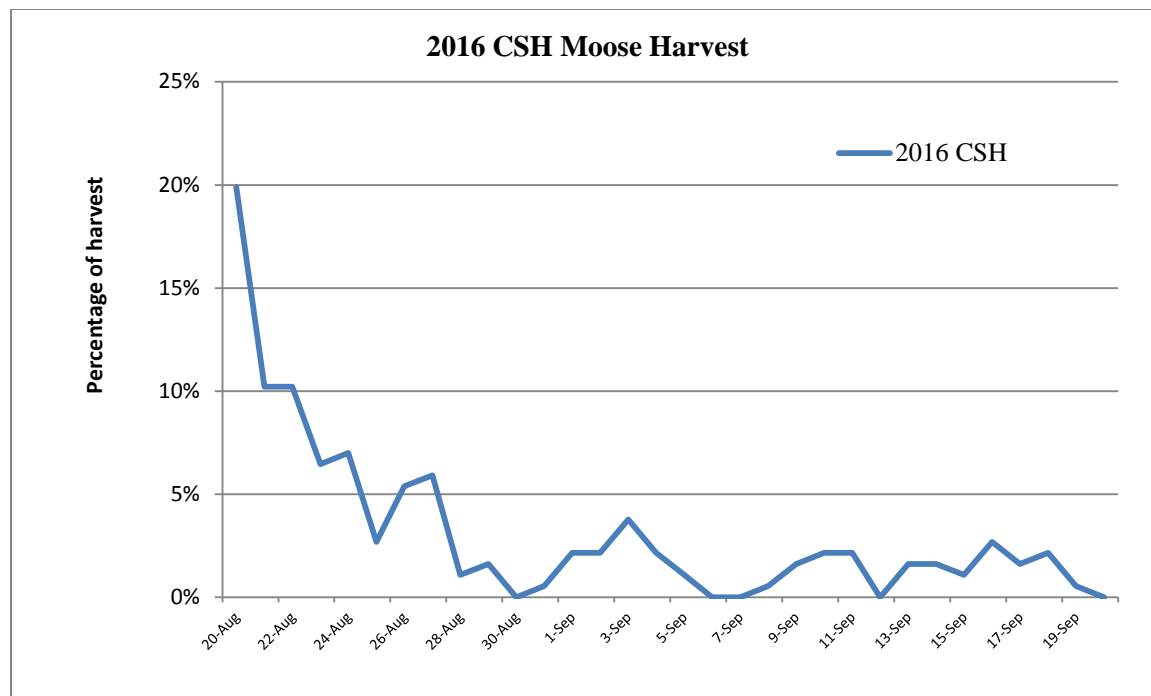


Figure 21-1. Moose harvest chronology in the CSH, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 21-2). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the observed bull ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 21-2. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose harvest in the CSH hunt area. If the CSH is eliminated, the board should consider whether reasonable opportunity for success in harvesting a moose for the communal pattern of use still exists, as well as overall reasonable opportunity for subsistence uses of moose in Units 11, 12, and 13.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 22: 5 AAC 85.045. Hunting seasons and bag limits for moose; and 92.050 Required permit hunt conditions and procedures. Eliminate the community subsistence harvest hunts for moose and adopt a resident “any-bull” registration hunt.

PROPOSED BY: Alaska Outdoor Council

WHAT WOULD THE PROPOSAL DO? Eliminate the CSH hunt for moose and replace with an any-bull registration permit hunt with the season dates of August 25–September 20 and December 25–December 31 with a bag limit of one moose per household every three regulatory years. The any-bull bag limit would revert to the Unit 13 harvest ticket bag limit of spike-fork, 50 inches, or four brow tines when a hunt quota of 100 any-bulls was met. The proposed harvest reporting requirement would be within five days of harvest.

WHAT ARE THE CURRENT REGULATIONS?

- The Board of Game has made a positive C&T use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 13 with an ANS of 300–600 moose.
- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).

- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one bull moose that does not meet harvest ticket antler restrictions for every three households.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will still need to comply with the conditions of the CSH hunt. All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt for a period of two or more years.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG.

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Unit 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one “any-bull” locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose hunt (CM300) would be eliminated as a hunt option for moose in Unit 13 and the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. The CSH quota of up to 100 “any-bull” would be allocated to the individual pattern of use through a

registration hunt structure. The proposed registration hunt would be five days shorter than the current fall CSH moose hunt.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration “any-bull” moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 22-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 22-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including, since 2009, an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”). Hunters harvested an average of 898 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 22-1).

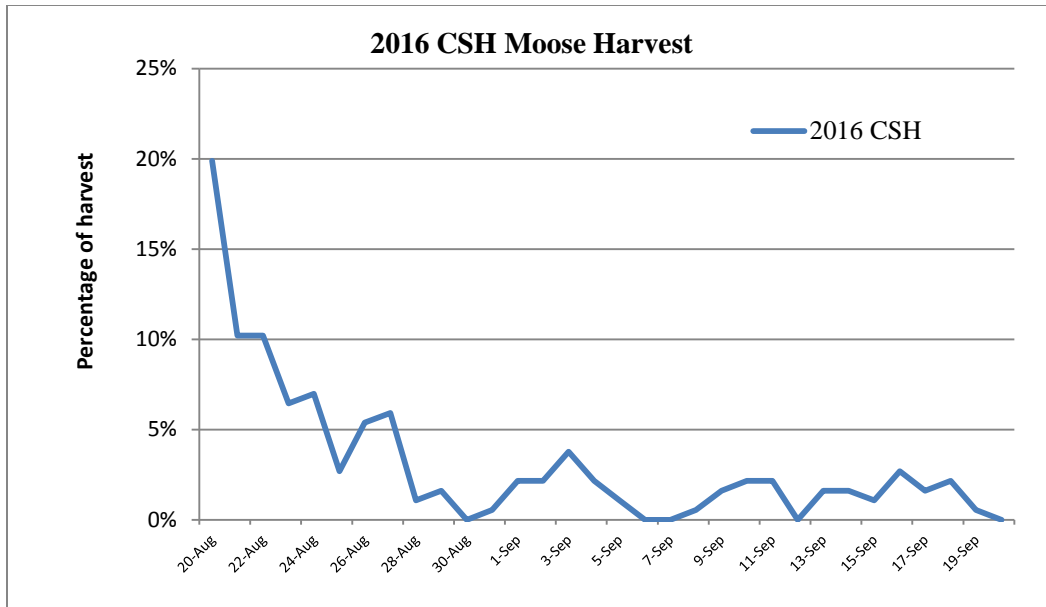


Figure 22-1. Moose harvest chronology in the CSH, RY 2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 22-2). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the observed bull ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 22-2. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose harvest in Units 11, 12, and 13. If the CSH is eliminated, the board should consider whether reasonable opportunity for success in harvesting a moose for the communal pattern of use still exists. The proposed five-day harvest report requirement would likely be too long for effective in-season monitoring of the 100 any-bull quota. Small subunit-based quotas are more effectively monitored by a 24-hour harvest report requirement. If the season was reduced, the board will also need to determine if the proposed hunt will continue to provide reasonable opportunity for success in harvesting moose in Units 11, 12, and 13 for subsistence purposes.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

Note: This proposal also recommends changes to the brown bear bag limits in Unit 13 which were not on the call for this special meeting and are not included in this staff comment.

PROPOSAL 23: 5 AAC 85.045. Hunting seasons and bag limits for moose. Eliminate the community subsistence harvest moose hunt.

PROPOSED BY: Claude Bondy

WHAT WOULD THE PROPOSAL DO? Eliminate the community subsistence harvest hunt, the registration hunt, and all the drawing hunts for moose in the area.

WHAT ARE THE CURRENT REGULATIONS?

- The Board of Game has made a positive C&T use finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T use finding for moose in Unit 13 with an ANS of 300–600 moose.
- The Copper Basin Community Subsistence Harvest Hunt area includes all of Units 11, 13, and a portion of Unit 12 (southwest of the Tok River where it crosses the Glenn Highway Tok Cut-Off).
- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with three or more brow tines (Unit 11), or four or more brow tines on one side (Unit 13 and a portion of Unit 12). Each CSH group has a bag limit of one bull moose that does not meet harvest ticket antler restrictions for every three households.
- Each community or group must have 25 qualified individuals to successfully apply for any CSH program statewide. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will still need to comply with the conditions of the CSH hunt.
- All Copper Basin CSH applicants and their household members are required to participate in the CSH hunt or a period of two or more years.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG.

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose hunt (CM300) would be eliminated as a hunt option for moose in Unit 13, and the board may not be providing a reasonable opportunity for the community pattern of use that was adopted into regulation. The winter registration hunt and the drawing hunts for moose would also be eliminated, resulting in a reduction of opportunity for the individual pattern of use that was adopted into regulation.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration “any-bull” moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 23-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 23-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^bEmergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^cAdditional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”) since 2009. Hunters harvested an average of 898 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 23-1).

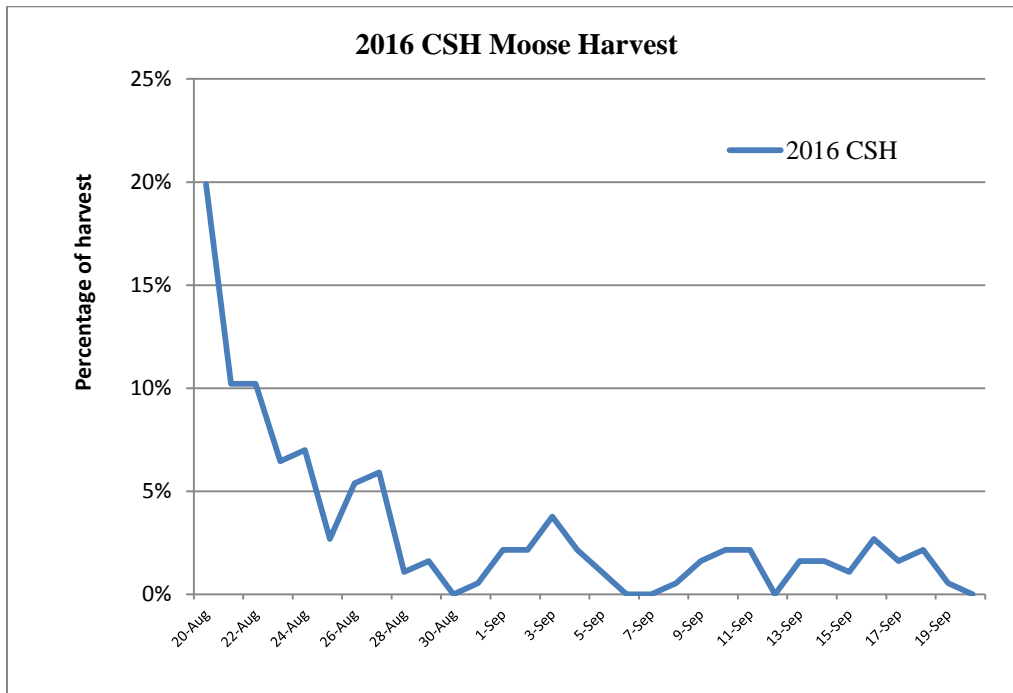


Figure 23-1. Moose harvest chronology in the CSH, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 23-2). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse

effect on bull:cow ratios. One exception may be in 13A where the observed bull ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 23-2. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose harvest in the CSH hunt area. If adopted, the board should consider whether reasonable opportunity for success in harvesting a moose or caribou for both the communal and individual patterns of use still exist, as well as overall reasonable opportunity for subsistence uses of moose and caribou in Units 11, 12, and 13.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 24 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Clarify the communities eligible for the 100 “any-bull” quota and extend the CSH moose season.

PROPOSED BY: Ahtna Tene Nené

WHAT WOULD THE PROPOSAL DO? Extend the CSH moose season by five days and clarify that the CSH quota of “any-bull” is allocated to members of the designated communities specified in 5AAC 92.074(d).

WHAT ARE THE CURRENT REGULATIONS? The Board of Game has made a positive C&T use finding for moose in Unit 13 with an ANS of 300–600 moose. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- CSH participants have a bag limit of one bull from August 10–September 20 (CM300). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the Copper Basin CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines. Each CSH group is limited to one any-bull for every three households.
- Resident hunters with harvest tickets for Unit 13 may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters who successfully draw a Unit 13 bull moose drawing permit (DM324) are permitted one bull from September 1–20; up to five permits may be issued, and all five were issued in 2016

- Resident hunters who successfully draw a Unit 13 antlerless moose drawing permit (DM325) are allowed to harvest one antlerless moose from October 1–31 or March 1–31 (no take of calves or cows accompanied by a calf); up to 200 permits may be issued. Ten permits were issued in 2016.
- Federally qualified subsistence users can obtain a federal moose permit (FM1301). The season is August 1–September 20 with a bag limit of one antlered bull moose per household for residents who qualify for 13E, or one antlered bull moose per hunter for residents who qualify for the remainder of Unit 13. Federal permits are valid for federal lands only.
- Nonresident hunters who successfully draw a Unit 13 drawing permit (DM335–DM339) are permitted one bull with 50-inch antlers or antlers with four or more brow tines on one side from September 1–20; up to 150 permits may be issued and 115 permits were issued in 2016.
- To participate in any CSH program statewide, a community or group must have at least 25 qualified individuals successfully apply. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- All Copper Basin CSH moose hunt applicants and their household members must make a commitment to the hunt for a period of two or more years.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will still need to comply with the conditions of the CSH hunt.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG, namely:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one “any-bull” locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an “any-bull” moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.

- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Only members of the eight communities for which the CSH hunt was originally designed would be able to harvest from the CSH “any-bull”, and without an allocation, there would be no any-bull quota for CSH participants outside of those communities. The CSH moose season close date would change from September 20 to September 25.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), and winter registration “any-bull” moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 24-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 24-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^a The community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including an average of 81 bulls that do not meet antler restrictions (“any-bull”) since 2009 (Table 24-2). Hunters harvested an average of 898 moose annually during the same period (Table 24-3). Residents of Unit 13 harvested 13 (11.7%) of those “any-bulls”, while residents of other Alaskan communities harvested 98 (88.3%) of those “any-bulls” (Table 24-4).

Much of the CSH harvest occurs during the first ten days of the season.

Table 24-2. CSH moose harvest by unit, RY2016.

	“Any-Bull” Quota	“Any-Bull” Harvest	“Any-Bull” Closure	Antler Legal Harvest	Total Harvest
13A WEST	0	1		32	33
13A EAST	10	8		2	10
13B	30	31	EO Sept 2	24	55
13C	18	20		4	24
13D	14	15	EO Sept 2	6	21
13E	26	38	EO Aug 24	19	57
11Z	2	1		0	1
	100	114		87	201

Table 24-3. Unit 13 moose harvest by hunt, RY2009, 2011–2016.

Regulatory Year	CM300 Harvest	GM000 Harvest	FM1301 Harvest	Draw Permit Harvest	Total Harvest
2009	98	631	61	76	866
2011	83	724	80	65	952
2012	97	518	59	46	720
2013	156	450	50	67	723
2014	149	675	86	27	937
2015	170	765	85	30	1,050
2016 ^a	198	709	100	30	1,037

^a Harvest data is not finalized.

Table updated 3/7/2017.

Table 24-4. CSH any-bull moose harvests by hunter residency, 2009–2016.

Year	Residency of hunter				Total any-bull harvest
	Unit 13		Other Alaska		
	Number of any-bulls harvested	Percent of any-bull harvest	Number of any-bulls harvested	Percent of any-bull harvest	
2009	66	97.1%	2	2.9%	68
2010	<i>The community hunt was not offered in regulatory year 2010</i>				
2011	39	66.1%	20	33.9%	59
2012	23	31.5%	50	68.5%	73
2013	11	13.6%	70	86.4%	81
2014	16	20.8%	61	79.2%	77
2015	23	25.0%	69	75.0%	92
2016 ^a	14	14%	100	87.7%	114

^a Harvest data is not finalized.

Table updated 3/7/2017.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 24-5). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in Unit 13A where the bull ratio observed was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 24-5. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the proposed allocation of moose harvest. The overall moose harvest is not expected to change considerably by clarifying the allocation of 100 “any-bull” to the original eight communities. The board will need to determine if the proposed hunt will continue to provide reasonable opportunity for success in harvesting Unit 11, 12, and 13 moose for subsistence purposes.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 25 – 5 AAC 85.045 Hunting seasons and bag limits for moose; and 92.050 Required permit hunt conditions and procedures. Eliminate the community subsistence harvest for moose, or

require hunters to choose subsistence or harvest ticket/registration/drawing hunts and restrict the hunt area.

PROPOSED BY: Sam Smith

WHAT WOULD THE PROPOSAL DO? Eliminate the CSH hunt for moose or require hunters to choose between the harvest ticket bag limit or the CSH bag limit. Hunters who choose the CSH bag limit could only take a moose within 50 miles from their home community.

WHAT ARE THE CURRENT REGULATIONS? The Board of Game has made a positive C&T use finding for moose in Unit 13 with an ANS of 300–600 moose. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- Resident hunters with CSH harvest reports may harvest one bull from August 10–September 20 (CM300) and December 1–31 (CM301). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the Copper Basin CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines. Each CSH group is limited to one any-bull for every three households.
- Resident hunters with harvest tickets for Unit 13 may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters who successfully draw a Unit 13 bull moose drawing permit (DM324) are permitted one bull from September 1–20; up to five permits may be issued.
- Resident hunters who successfully draw a Unit 13 antlerless moose drawing permit (DM325) are allowed to harvest one antlerless moose from October 1–31 or March 1–31; up to 200 permits may be issued.
- Federally qualified subsistence users can obtain a federal moose permit (FM1301). The season is August 1–September 20 with a bag limit of one antlered bull moose per household for residents that qualify for 13E, or one antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal lands only.
- Nonresident hunters who successfully draw a Unit 13 drawing permit (DM335-DM339) are permitted one bull with 50-inch antlers or antlers with four or more brow tines on one side from September 1–20; up to 150 permits may be issued.
- To participate in any CSH program statewide, a community or group must have at least 25 qualified individuals successfully apply. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year. All Copper Basin CSH moose hunt applicants and their household members are required to abide by the restrictions associated with the hunt for a period of two or more years.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or

attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board's finding at 2006-170-BOG, namely:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an "any-bull" moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? If the CSH hunt were eliminated, the board may no longer be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. If the CSH moose hunt is limited as proposed (rather than eliminated), CM300 permit holders would be allowed one moose that does not meet harvest ticket antler restrictions, which would be a significant reduction in bag limit. Spike/fork/50-inch and/or four brow tine moose would not be legal harvest for CM300 participants, which would also be a significant reduction. The 100 any-bull moose quota would remain in effect, but the entire CM300 moose harvest would be limited to 100 bulls. Furthermore, CSH hunters would be restricted to hunting within 50 miles of the community in which they live. Some communities or groups would no longer be eligible to hunt because the communities are more than 50 miles from the Copper Basin hunt area.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) "the community-based pattern established by the Ahtna"(2006-170-BOG). The board recognized that the community-based pattern has been "adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents."

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration "any-bull" moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 25-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 25-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^bEmergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^cAdditional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”) since 2009 (Table 25-2). Hunters harvested an average of 898 moose annually during the same period (Table 25-3). Much of the CSH harvest occurs during the first ten days of the season (Figure 25-1). Residents of Unit 13 harvested 13 (11.7%) of those “any-bull”, while residents of other Alaskan communities harvested 98 (88.3%) of those “any-bull” (Table 25-4).

Table 25-2. CSH moose harvest by unit, 2016.

	“any-bull” Quota	“any-bull” Harvest	“any-bull” Closure	Antler Legal Harvest	Total Harvest
13A West	0	1		32	33
13A East	10	8		2	10
13B	30	31	EO Sept 2	24	55
13C	18	20		4	24
13D	14	15	EO Sept 2 EO Aug	6	21
13E	26	38	24	19	57
11Z	2	1		0	1
	100	114		87	201

Table 25-3. Unit 13 moose harvest by hunt, RY2009, 2011–2016.

Regulatory Year	CM300 Harvest	GM000 Harvest	FM1301 Harvest	Draw Permit Harvest	Total Harvest
2009	98	631	61	76	866
2011	83	724	80	65	952
2012	97	518	59	46	720
2013	156	450	50	67	723
2014	149	675	86	27	937
2015	170	765	85	30	1,050
2016	198	709	100	30	1,037

Table 25-4. CSH any-bull moose harvests by hunter residency, 2009–2016.

Year	Residency of hunter				Total any-bull harvest
	Unit 13		Other Alaska		
	Number of any-bulls harvested	Percent of any-bull harvest	Number of any-bulls harvested	Percent of any-bull harvest	
2009	66	97.1%	2	2.9%	68
2010	<i>The community hunt was not offered in regulatory year 2010</i>				
2011	39	66.1%	20	33.9%	59
2012	23	31.5%	50	68.5%	73
2013	11	13.6%	70	86.4%	81
2014	16	20.8%	61	79.2%	77
2015	23	25.0%	69	75.0%	92
2016 ^a	14	14%	100	87.7%	114

^a Harvest data is not finalized

Table updated 3/7/2017.

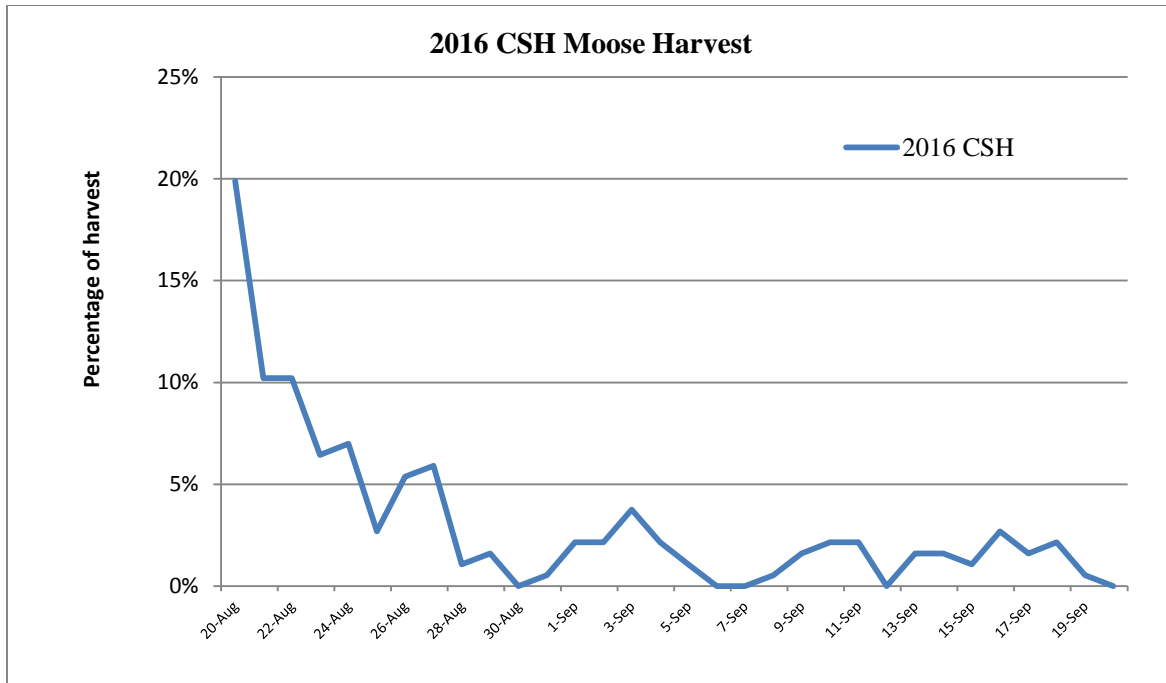


Figure 25-1. Moose harvest chronology in the CSH hunt, RY2016

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 25-5). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the bull ratio observed was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 25-5. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose between hunt structures. If the CSH were eliminated, the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. The department is also **NEUTRAL** on the alternative proposal to restrict the CSH moose harvest to 100 “any-bull”, removing the option for CM300 hunters to harvest moose that are legal under harvest ticket antler restrictions, and limits the CSH hunt area to within 50 miles of participating communities; however, the board should consider whether adoption would continue to provide a reasonable opportunity for success in harvesting a moose for subsistence uses in Units 11, 12, and 13. The department anticipates that fewer hunters would participate in the CSH moose hunt and that harvests would decline; however, the overall moose harvest in Unit 13 is not anticipated to show considerable changes if this proposal is adopted.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 26 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Change the antler restrictions for the harvest ticket/registration/drawing moose hunts in Unit 13.

PROPOSED BY: Larry Leveen

WHAT WOULD THE PROPOSAL DO? Remove the opportunity to harvest moose with 50-inch antlers unless they have at least 4 brow tines on one side, while retaining the spike/fork component.

WHAT ARE THE CURRENT REGULATIONS? Hunters who wish to hunt moose in Unit 13 can do so under the following seasons and bag limits:

- Resident hunters with harvest tickets for Unit 13 may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters who successfully draw a Unit 13 bull moose drawing permit (DM324) are permitted one bull from September 1–20.
- Resident hunters who successfully draw a Unit 13 antlerless moose drawing permit (DM325) are allowed to harvest 1 antlerless moose from October 1–31 or March 1–31; up to 200 permits may be issued.
- Federally qualified subsistence users can obtain a federal moose permit (FM1301). The season is August 1–September 20 with a bag limit of one antlered bull moose per household for residents that qualify for 13E, or one antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal lands only.
- Nonresident hunters who successfully draw a Unit 13 drawing permit (DM335-DM339) are permitted one bull with 50-inch antlers or antlers with four or more brow tines on one side from September 1–20; up to 150 permits may be issued.

- There is a positive C&T finding for moose in Unit 13 with an ANS of 300–600.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters with harvest tickets in Unit 13 would be able to harvest a spike/fork or a moose with four or more brow tines on at least one side. Moose with antlers greater than 50 inches but less than 4 brow tines on both sides would not be eligible for harvest with a harvest ticket.

BACKGROUND: The population objective for moose in Unit 13 is 17,000–21,400 with a harvest objective of 1,050–2,180. Current antler restrictions for harvest ticket moose hunters in Unit 13 allow for increased opportunity while restricting harvest sufficiently to maintain adequate bull cow ratios (tables 26-1 and 26-2).

Table 26-1. Moose harvest, harvest tickets, in Unit 13

Regulatory Year	Moose with 4 or more brow tines on at least one side	Moose with antlers 50" or greater	Moose with antlers 50" or greater and 4 or more brow tines on at least one side ^a
2012	153	217	89
2013	118	192	54
2014	257	345	131
2015	287	436	191
2016 ^b	263	332	151

^a Some reports do not include both antler width data and number of brow tines.

^b Harvest data is not finalized

Table 26-2. Bull:cow ratios observed in Unit 13 subunits

Regulatory Year	Bulls: 100 Cows				
	13A	13B	13C	13D	13E
2011	26	35	30	62	31
2012	26	33	30	67	32
2013	21	38	44	90	34
2014	28	38	37	70	41
2015	25	37	30	58	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocative intent of this proposal and **OPPOSED** to removing the opportunity to harvest bull moose with 50 inch or greater antlers and less than four brow tines on both sides because it would likely reduce harvest throughout Unit 13. Moose harvested within that class aid in achieving unit-wide harvest objectives. Bull-to-cow ratios indicate that current harvest levels pose no biological concern to the moose population.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 27 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Change the antler restrictions for the harvest ticket/registration/drawing moose hunt in Unit 13.

PROPOSED BY: Ronald Faulkner

WHAT WOULD THE PROPOSAL DO? Add the opportunity under the harvest ticket moose hunt to harvest moose with three brow tines on both sides.

WHAT ARE THE CURRENT REGULATIONS? There is a positive C&T use finding in Unit 13 with an ANS for moose of 300-600. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- Resident hunters with harvest tickets for Unit 13 may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.

- Resident hunters who successfully draw a Unit 13 bull moose drawing permit (DM324) are permitted one bull from September 1–20. Up to five permits may be issued; all five were issued in 2016.
- Resident hunters who successfully draw a Unit 13 antlerless moose drawing permit (DM325) are allowed to harvest one antlerless moose from October 1–31 or March 1–31; up to 200 permits may be issued. Ten permits were issued in 2016.
- A winter registration hunt (RM319) to take one bull from December 1–31 was also authorized by the Board of Game, but has not been implemented by the department since 2014 due to concerns about high levels of participation and our ability to manage the hunt within biologically sustainable limits.
- Federally qualified subsistence users can obtain a federal moose permit (FM1301). The season is August 1–September 20 with a bag limit of one antlered bull moose per household for residents who qualify for 13E, or one antlered bull moose per hunter for residents who qualify for the remainder of Unit 13. Federal permits are valid for federal lands only.
- Nonresident hunters who successfully draw a Unit 13 drawing permit (DM335-DM339) are permitted one bull with 50-inch antlers or antlers with four or more brow tines on one side from September 1–20; up to 150 permits may be issued; 115 permits were issued in 2016.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters with harvest tickets in Unit 13 would be able to harvest either a spike/fork moose, a moose with four or more brow tines on at least one side, or a moose with three brow tines on both sides.

BACKGROUND: Current antler restrictions for harvest ticket moose hunters in Unit 13 allow for adequate opportunity while restricting harvest sufficiently to maintain bull-to-cow ratios above the unitwide objective of 25 bulls to 100 cows (Table 27-1). Annual moose surveys in Unit 13 document many moose with three brow tines on both sides that do not meet current 50-inch antler restrictions. In 2016, a post-hunt survey of one moose trend count area in 13A (intensive survey of a 581 square mile area) observed 14 moose with three brow tines on both sides and less than 50-inch antlers out of a total of 159 bulls observed (8.8%). Of the 159 bulls observed in the trend count area, no bulls had 50-inch or greater antlers, and 33 bulls were spike/fork.

Table 27-1. Bull cow ratios observed in Unit 13 subunits.

Regulatory Year	Bulls: 100 Cows				
	13A	13B	13C	13D	13E
2011	26	35	30	62	31
2012	26	33	30	67	32
2013	21	38	44	90	34
2014	28	38	37	70	41
2015	25	37	30	58	25

DEPARTMENT COMMENTS: The department is **OPPOSED** to this proposal because an increase in the harvest of bulls may create a biological concern if the bull-to-cow ratio is decreased by the proposed

regulation. The current level of harvest does not present a biological concern, but increasing the harvest of bull moose may reduce the bull-to-cow ratio below objectives. Most “any-bull” in Unit 13 with less than 50-inch antlers have three brow tines on both sides. Allowing additional harvest of bulls with three brow tines on both sides will likely result in increased harvest of bulls, which may have detrimental effects on bull-to-cow ratios, particularly in Unit 13A.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 28 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Change the antler restrictions for the harvest ticket moose hunt in Unit 13.

PROPOSED BY: Lee Adler

WHAT WOULD THE PROPOSAL DO? Change antler restrictions for the harvest ticket moose hunt in Unit 13 so that only bulls 36-inches or larger may be harvested.

WHAT ARE THE CURRENT REGULATIONS? There is a positive C&T use finding in Unit 13 with an ANS for moose of 300–600. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- Resident hunters with harvest tickets for Unit 13 may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters who successfully draw a Unit 13 bull moose drawing permit (DM324) are permitted one bull from September 1–20. Up to five permits may be issued; all five were issued in 2016.
- Resident hunters who successfully draw a Unit 13 antlerless moose drawing permit (DM325) are allowed to harvest 1 antlerless moose from October 1–31 or March 1–31; up to 200 permits may be issued. Ten permits were issued in 2016.
- Federally qualified subsistence users can obtain a federal moose permit (FM1301). The season is August 1–September 20 with a bag limit of one antlered bull moose per household for residents who qualify for 13E, or one antlered bull moose per hunter for residents who qualify for the remainder of Unit 13. Federal permits are valid for federal lands only.
- A winter registration hunt (RM319) to take one bull from December 1–31 was also authorized by the Board of Game, but has not been implemented by the department since 2014 due to concerns about high levels of participation and our ability to manage the hunt within biologically sustainable limits.
- Nonresident hunters who successfully draw a Unit 13 drawing permit (DM335–DM339) are permitted one bull with 50-inch antlers or antlers with four or more brow tines on one side from September 1–20; up to 150 permits may be issued; 115 permits were issued in 2016.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters with harvest tickets in Unit 13 would be able to harvest a moose with antlers 36-inches wide or larger.

BACKGROUND: Current antler restrictions for harvest ticket moose hunters in Unit 13 allow for adequate opportunity while restricting harvest sufficiently to maintain bull-to-cow ratios above the unitwide objective of 25 bulls to 100 cows (tables 28-1 and 28-2). The spike/fork/50-inch hunt structure is widely used because it has the demonstrated effect of protecting mid-class bulls to allow a portion of each cohort to mature and ensure annual reproductive success of the population.

Table 28-1. Moose harvest in Unit 13, harvest tickets.

Regulatory Year	Moose with antlers 50" or wider	Total Harvest	Percent of Harvest
2012	217	518	42%
2013	192	450	43%
2014	345	674	51%
2015	436	765	57%
2016	332	701	47%

Table 28-2. Bull:cow ratios observed in Unit 13 subunits.

Regulatory Year	Bulls: 100 Cows				
	13A	13B	13C	13D	13E
2011	26	35	30	62	31
2012	26	33	30	67	32
2013	21	38	44	90	34
2014	28	38	37	70	41
2015	25	37	30	58	25

DEPARTMENT COMMENTS: The department is **OPPOSED** to changing the bag limit for bull moose in Unit 13. Bull-to-cow ratios indicate that current harvest levels have not created a biological concern. Given the amount of moose hunting pressure currently observed in Unit 13, allowing the harvest of all bulls with antlers greater than 36-inches prior to the rut may have a negative effect on the number of mature bulls available to reproduce, and it could decrease the bull-cow ratio below management objectives.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 29 – 5 AAC 85.045 Hunting seasons and bag limits for moose.

PROPOSED BY: Resident Hunters of Alaska

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the nonresident moose season in Unit 13.

WHAT ARE THE CURRENT REGULATIONS?

- There is a positive C&T use finding for moose in Unit 13 with an ANS of 300–600.

- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300) and December 1–31 (CM301). The board has established an allocation of 100 any-bull moose (bull moose that do not meet harvest ticket antler restrictions) for the fall CSH season. Once the 100 “any-bull” allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side. Each CSH group has a bag limit of one “any-bull” for every three households.
- Resident hunters with harvest tickets may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters may also apply for a drawing permit hunt for one antlerless moose (no take of calves or cows accompanied by a calf; DM325). Open season for DM325 is October 1– 31 and March 1–31, and up to 200 permits may be issued. Ten permits were issued in 2016.
- Resident hunters may also apply for a drawing permit for one bull (DM 324), with an open season of September 1–20. Up to five permits may be issued, and all five permits were issued in 2016.
- A winter registration hunt (RM319) and a winter CSH hunt (CM301) to take one bull from December 1–31 were also authorized by the Board of Game, but have not been implemented by the department since 2014 due to concerns about high levels of participation and our ability to manage the hunt within biologically sustainable limits.
- Nonresidents with a drawing permit (DM335–DM339) are allowed to hunt for one bull with 50-inch antlers or antlers with four or more brow tines. Up to 150 permits may be issued, and 115 permits were issued in 2016.
- Federal subsistence regulations provide additional opportunity for residents of Units 12, 13, 20A, and 20D. Alaska residents who qualify to hunt under federal regulations can obtain a permit (FM1301) to harvest one antlered bull per household in Unit 13E or one antlered bull per person in the remainder of Unit 13. The federal season is August 1–September 20.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Moose hunting opportunity in Unit 13 would be limited to residents only.

BACKGROUND: The Board of Game approved a limit of 150 nonresident draw permits for Unit 13. A range of 50–115 nonresident moose permits have been issued in Unit 13 since 2009, resulting in an average nonresident moose harvest of 17 moose annually (tables 29-1 and 29-2). Hunters harvested an average of 898 moose annually during the same period.

Table 29-1. Unit 13 moose harvest by hunt, RY2009, 2009–2016.

Regulatory Year	CM300 Harvest	GM000 Harvest	FM1301 Harvest	Draw Permit Harvest	Total Harvest
2009	98	631	61	76	866
2011	83	724	80	65	952
2012	97	518	59	46	720
2013	156	450	50	67	723
2014	149	675	86	27	937
2015	170	765	85	30	1,050
2016	198	709	100	30	1,037

Table 29-2. Unit 13 nonresident moose permits and harvest, 2009–2016.

Year	Applications Received	Permits Issued	Total Harvest	Total Hunted	Success (Percent)
2009	224	50	12	33	36%
2010	393	110	13	60	22%
2011	428	65	16	35	46%
2012	751	105	9	57	16%
2013	873	105	18	60	30%
2014	905	115	20	69	29%
2015	1,205	115	23	60	38%
2016	517	115	21	58	36%

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 29-3). Current harvests have been increasing in recent years though harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the observed bull-to-cow ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 29-3. Unit 13 moose population objectives and 2015 estimates

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose harvest in Unit 13.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSALS 30–31: 5 AAC 85.025 Hunting seasons and bag limits for caribou. Eliminate the community subsistence harvest hunt for caribou.

PROPOSED BY:

- Denali Fish and Game Advisory Committee (Proposal 30) – Issues: CC001 is confusing and RC566 provides adequate opportunity.
- Alaska Outdoor Council (Proposal 31) – Issues: Financially and administratively burdensome to administer and RC566 provides adequate opportunity.

WHAT WOULD THE PROPOSAL DO? Eliminate the community subsistence harvest hunt for caribou (CC001).

WHAT ARE THE CURRENT REGULATIONS? There is a positive C&T finding for the Nelchina caribou herd in Unit 13 with an ANS of 600–1,000 caribou.

Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures. Currently there is no nonresident hunting season for Nelchina caribou in Unit 13.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20* and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- CSH permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20* and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of CSH permits that may be issued annually.
- One drawing permit hunt for caribou in Unit 13 (DC485) is available for resident hunters. Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20* and October 21–March 31 with a bag limit of 1 caribou.
- Federal subsistence regulations provide additional opportunities for residents of Units 11, 12, 13, 20A, and 20D. Alaska residents who qualify to hunt under federal regulations can obtain a permit (FC1302) to harvest two caribou in Units 13A and 13B and two bulls in Units 13C, 13D, and 13E—a total bag limit of two caribou per hunter. The federal seasons are August 1–September 30 and October 21–March 31 throughout Unit 13.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed

on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year but will still need to comply with the conditions of the CSH hunt.

**Note: The fall Nelchina caribou hunting season was extended by Emergency Order until September 30 for all state hunts in 2016.*

Up to 300 caribou can be taken by all CSH caribou groups combined.

CSH caribou hunt participants (recipients of CC001, and all household members) must apply as part of a community or group of at least 25 individuals and must make a two-year commitment. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.

In addition to regulations, the board has approved the following CSH hunt conditions under the department's discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board's finding at 2006-170-BOG, namely:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration caribou hunts, or hold caribou harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- After the CSH hunt has ended, if the household was unsuccessful in filling the CSH bag limit during the CSH hunt, household members may hunt in areas outside the CSH hunt area with caribou harvest tickets or other state caribou permits where the bag limit is greater than one caribou per household.
- No member of the household may hunt moose outside of the CSH hunt area.
- Any member of the household may harvest the caribou, and any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the heart, liver, kidneys, and fat, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Prior to October 1, meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by Emergency Order to one bull or one cow, or the hunt may be closed by Emergency Order.

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? The CSH caribou hunt (CC001) would be eliminated as a hunt option for caribou in Unit 13 and the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. Caribou hunting opportunities would only be provided for the individual pattern of use through harvest ticket, registration, and drawing opportunities.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized that there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose and caribou hunts to provide a reasonable opportunity for the community-based pattern in addition to other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community.

The management objective for the Nelchina caribou herd is to maintain a population between 35,000 and 40,000 animals. A minimum count of the Nelchina herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

In March 2009 the board established the current ANS of 600–1,000 caribou for the Nelchina caribou herd (NCH). When the Nelchina harvest quota is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus comprises resident-only hunts, including Tier I hunts (Copper Basin CSH hunt CC001, and Tier I registration hunt RC566) and drawing permit hunts. The board has not established a harvest quota threshold that would allow nonresident hunting opportunity when the threshold is exceeded.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009 – including federal harvest. Nonresident hunting opportunity has not been provided since 1981.

For RY2016 the maximum number of draw permits (5,000) were issued in addition to household permits for all successful applicants of the Tier I (8,470) and the CSH hunts(1,006), for a total of 14,476 permits (Table 30-1). The Nelchina harvest quota was 4,000 caribou (2,000 cows and 2,000 bulls) for the fall 2016 season. In an effort to maximize harvest, the fall season was extended by emergency order from September 20 to September 30 for all state hunts, and the harvest quota was removed for the current winter season, which remains open until March 31. As of January 4, 2017, 2,022 cows and 2,828 bulls have been reported in the state harvest and 157 cows and 265 bulls have been reported in the federal harvest for a total Nelchina harvest so far of 5,277 animals in the 2016–2017 season. This is the highest harvest since 1996, when 48,722 state permits were issued.

Table 30-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 Tier II permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15.

^d Harvest is ongoing.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of caribou hunting in Unit 13, and the total caribou harvest is not expected to change significantly if either or both of these proposals were adopted.

COST ANALYSIS: Adoption of these proposals is not expected to result in additional costs to the department.

PROPOSAL 32 – 5 AAC 92.050 Required permit hunt conditions and procedures. Change the eligibility criteria for Tier I caribou and moose hunts in Unit 13.

PROPOSED BY: Ahtna Tene Nené

WHAT WOULD THE PROPOSAL DO? Establish a Tier I moose hunt (one permit per eligible household) and require both Tier I moose and caribou applicants to successfully complete an application that demonstrates that the household is engaged in a subsistence pattern of use, including reliance on a wide diversity of fish and game resources from Unit 13 that provides substantial economic, cultural, social, and nutritional elements of the household’s subsistence way of life and other criteria identified in 5 AAC 99.010(b). The proposal also removes the restriction that prevents participants from hunting caribou and moose outside of Unit 13.

WHAT ARE THE CURRENT REGULATIONS? There is a positive C&T use finding for the Nelchina caribou herd in Unit 13 with an ANS of 600–1,000 caribou.

- Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures – including the Tier I caribou hunt (RC566). Tier I registration

permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20* and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually. Tier I Nelchina caribou hunt participants (recipients of RC566 and all household members) must abide by the following hunt conditions:

- No member of the household will be eligible to apply for or receive any other caribou permits.
- No member of the household may hunt caribou outside of Unit 13.
- No member of the household will be eligible to apply for or receive any moose permits outside of Unit 13.
- No member of the household may hunt moose outside of Unit 13.
- Any member of the household may harvest the caribou.
- Prior to Oct. 1, meat of the forequarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by Emergency Order to one bull or one cow, or the hunt may be closed by Emergency Order.
- No member of the household may proxy hunt for caribou or moose outside of Unit 13.
- Hunters can only proxy hunt for one Unit 13 caribou per regulatory year.
- Proxy hunters for RC566 caribou must abide by the hunt conditions of the RC566 permit and cannot hunt moose or caribou outside of Unit 13 for the regulatory year.
- Community Subsistence Hunt (CSH) hunters are not eligible to proxy hunt for RC566 permits.

**Note: The fall Nelchina caribou hunting season was extended by Emergency Order until September 30 for all state hunts in 2016.*

There is a positive C&T use finding for moose in Unit 13 with an ANS of 300-600. Hunters who wish to hunt moose in Unit 13 may do so with the following permits:

- CSH participants have a bag limit of one bull from August 10–September 20 (CM300). The board has established an allocation of 100 bull moose that do not meet harvest ticket antler restrictions to the Copper Basin CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines. Each CSH group is limited to one any-bull for every three households.
- Resident hunters with harvest tickets for Unit 13 may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters who successfully draw a Unit 13 bull moose drawing permit (DM324) are permitted one bull from September 1–20.
- Resident hunters who successfully draw a Unit 13 antlerless moose drawing permit (DM325) are allowed to harvest one antlerless moose from October 1–31 or March 1–31; up to 200 permits may be issued.
- Federally qualified subsistence users can obtain a federal moose permit (FM1301). The season is August 1–September 20 with a bag limit of one antlered bull moose per household for residents that qualify for 13E, or one antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal lands only.

- Nonresident hunters who successfully draw a Unit 13 drawing permit (DM335-DM339) are permitted one bull with 50-inch antlers or antlers with four or more brow tines on one side from September 1–20; up to 150 permits may be issued.
- 5 AAC 99.010(b), often called the “eight criteria,” describes the procedures by which the Board of Game and the Board of Fisheries determine if the way Alaskans use a resource is a customary and traditional way: if it is a “subsistence” use.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? A more detailed application process that would provide further information on a household’s subsistence uses of caribou would be required for Tier I caribou permits. Also, 5 AAC 92.050(a)(4) would be amended to include language for a Tier I moose hunt with the same application process, which would also provide further information on a household’s subsistence uses. Presumably, the Tier I moose application would replace all other state moose hunting opportunities. However, due to court decisions, demonstration of an already-established pattern of use could not be used to determine eligibility for the hunts.

BACKGROUND: The eight criteria in 5 AAC 99.010 were developed to focus on subsistence uses of wild resource on a community and area level, and not on individual subsistence users themselves. In 2006-170-BOG and 2011-184-BOG, the board recognized there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

As requested by the board, the department has instituted a questionnaire to better evaluate if community hunt participants had established, or were attempting to establish, a communal pattern of uses of the moose and caribou resources.

When the harvest quota for Nelchina caribou is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt–RC566) and resident-only drawing permit hunts. All Alaska state residents are eligible to apply for subsistence (Tier I) permits.

Since the implementation of the Tier I caribou permit in 2009, Tier I applicants and permit recipients have steadily increased (Table 32-1). Numbers of moose hunters in Unit 13 have not demonstrated the same rate of increase (Figure 32-1). The average annual moose hunter success rate since implementation of the Tier I caribou permit remains high (18%) and changes in moose hunter success more closely relate to number of moose hunters than number of Tier I caribou permit recipients.

Table 32-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009–2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15.

^d Harvest is ongoing.

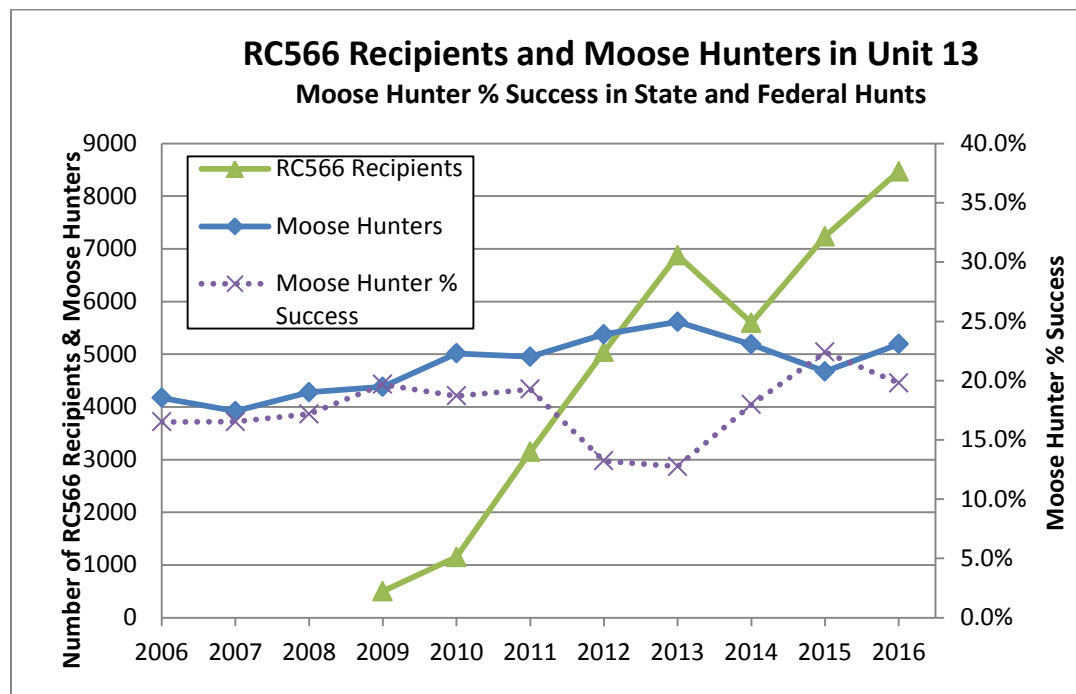


Figure 32-1. Number of RC566 permit recipients, moose hunters that reported hunting in Unit 13 and total moose hunt success rates for Unit 13.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on this proposal. If a Tier I moose hunt is established, it will essentially function the same as the harvest ticket moose hunt for residents and is not expected to affect the number of moose harvested. If an application is developed to demonstrate that the household is engaged in a subsistence pattern of use, any Alaska resident who wanted to participate in the Tier I moose or caribou hunt would still be eligible to participate, regardless if they had established the

pattern or not. Overall, the total number of permits issued each year is not likely to change, and moose and caribou harvest are not expected to be affected. Adoption of this proposal would require additional staff time to write, distribute, and review applications and determine if each household application demonstrates a subsistence pattern of use that includes reliance on a wide diversity of fish and game resources in Unit 13. Removing the prohibition on hunting moose and caribou outside of Unit 13 is likely to create additional hunter participation and potential crowding in Unit 13.

COST ANALYSIS: Adoption of this proposal is expected to result in additional costs to the department.

PROPOSAL 33 – 5 AAC 85.025 Hunting seasons and bag limits for caribou. Eliminate the caribou community subsistence harvest hunt, Tier I, and drawing hunts and the requirement to hunt moose in Unit 13; replace with registration hunt system.

PROPOSED BY: Aaron Bloomquist and Rebecca Schwanke

WHAT WOULD THE PROPOSAL DO? Eliminate all current caribou hunt structures and the requirement to hunt moose in Unit 13 and replace with a caribou registration hunt period system with salvage requirements that were the same as non-community hunts.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures. Currently there is no nonresident hunting season for Nelchina caribou in Unit 13.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20* and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of CSH permits that may be issued annually.
- There is a drawing permit hunt for caribou in Unit 13 (DC485). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of one caribou.
- Federally qualified subsistence users can obtain two federal caribou permits per person (FC1302). The season is August 1–September 30 and October 21–March 31 with a bag limit of one caribou per permit. Federal permits are valid for federal lands in Unit 13.

There is a positive C&T finding for the Nelchina caribou herd (NCH) in Unit 13 with an ANS of 600–1,000 caribou.

Tier I Nelchina caribou hunt participants (recipients of RC566 and all household members) must abide by the following hunt conditions:

- No member of the household will be eligible to apply for or receive any other caribou permits.
- No member of the household may hunt caribou outside of Unit 13.
- No member of the household will be eligible to apply for or receive any moose permits outside of Unit 13.
- No member of the household may hunt moose outside of Unit 13.
- Any member of the household may harvest the caribou.
- Prior to Oct. 1, meat of the forequarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by Emergency Order to one bull or one cow, or the hunt may be closed by Emergency Order.
- No member of the household may proxy hunt for caribou or moose outside of Unit 13.
- Hunters can only proxy hunt for one Unit 13 caribou per regulatory year.
- Proxy hunters for RC566 caribou must abide by the hunt conditions of the RC566 permit and cannot hunt moose or caribou outside of Unit 13 for the regulatory year.
- CSH hunters are not eligible to proxy hunt for RC566 permits.

CSH caribou hunt participants (recipients of CC001, and all household members) must apply as part of a community group of at least 25 individuals and must make a two-year commitment abiding by an extensive list of hunt conditions, including:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration caribou hunts, or hold caribou harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Unit 11, 13, and that portion of Unit 12 south of the Little Tok River).
- After the CSH hunt has ended, if the household was unsuccessful in filling the CSH bag limit during the CSH hunt, household members may hunt in areas outside the CSH hunt area with caribou harvest tickets or other state caribou permits where the bag limit is greater than one caribou per household.
- No member of the household may hunt moose outside of the CSH hunt area.
- Any member of the household may harvest the caribou, and any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the heart, liver, kidneys, and fat, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Prior to October 1, meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by Emergency Order to one bull or one cow, or the hunt may be closed by Emergency Order.
- The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year but will still need to comply with the conditions of the CSH hunt.
- Up to 300 caribou can be taken by all CSH caribou groups combined.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation, and the community hunt for caribou in the Copper Basin Subsistence hunt area would not be available. Caribou hunting opportunities would only be provided for the individual pattern of use. Resident hunters who desire to hunt Nelchina caribou would have the opportunity to register online for one of 18 different hunt periods that would be available August 10–September 20 and October 21–March 31. The department would make up to 2,000 permits available online for each of the 18 hunt periods on a first-come, first-served basis. Hunters would be expected to register for only one hunt period at a time, based on an honor system. Hunters could register for an additional hunt period if their initial hunt period had passed, if they were unsuccessful in harvesting a caribou, and if permits remained available for a later hunt period. This would result in a maximum of 2,000 Nelchina hunters in the field at any given time. In addition, caribou hunters would no longer be restricted to hunt moose in Unit 13, and the salvage requirements required by the board to show that a community or group is using the caribou according to the appropriate pattern under the current CSH hunt would be eliminated.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose and caribou hunts to provide a reasonable opportunity for the community-based pattern in addition to other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community.

The management objective for the NCH is to maintain a population between 35,000 and 40,000 animals. A minimum count of the herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

The relative ease of access to the Nelchina caribou herd from the road system in the fall season and proximity to Alaska’s largest human population centers makes it a popular herd among hunters. For RY2016 there were 22,269 applications submitted for all Nelchina caribou permit opportunities.

When the harvest quota for Nelchina caribou is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts.

Tier I and CSH caribou opportunities were created with the requirement that participants hunt moose only in Unit 13, with the intention of providing hunt conditions in alignment with board findings that a communal pattern of use included close ties to the community hunt area, and reliance on a wide variety of resources from that hunt area. Since the implementation of the Tier I and CSH caribou permits, applicants

and permit recipients for both hunts have steadily increased (Table 33-1). Numbers of moose hunters in Unit 13 have not mirrored the same rate of increase (Figure 33-1). The average annual moose hunter success rate since implementation of the Tier I caribou permit remains high (18%) and changes in moose hunter success more closely relate to number of moose hunters than number of Tier I caribou permit recipients.

Table 33-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15 .

^d Harvest is ongoing.

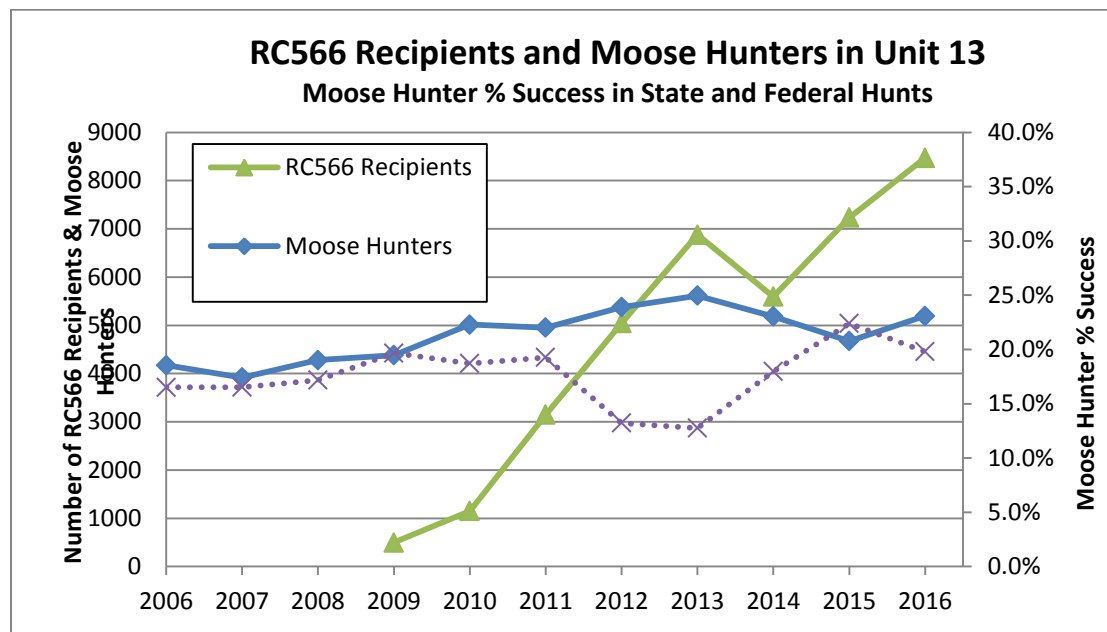


Figure 33-1. Number of RC566 permit recipients, moose hunters who reported hunting in Unit 13 and total moose hunt success rates for Unit 13.

Customary and traditional uses of Nelchina caribou are thoroughly described in 2006-170-BOG and clearly spelled out in the application. The board found that the subsistence pattern in the Copper Basin is characterized by thorough use of most of the harvested animal; therefore, all participants must follow the salvage requirements as stated above.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009 – including federal harvest. Nonresident hunting opportunity has not been provided since 1981.

For RY2016 the maximum number of draw permits (5,000) were issued in addition to all successful applicants of the Tier I (8,470) and the CSH hunts (1,006) for a total of 14,476 permits (Table 33-1). The Nelchina harvest quota was 4,000 caribou (2,000 cows and 2,000 bulls) for the fall 2016 season. In an effort to maximize harvest, the fall season was extended by emergency order from September 20 to September 30 for all state hunts, and the harvest quota was removed for the current winter season, which remains open until March 31. As of January 4, 2017, 2,022 cows and 2,828 bulls have been reported in the state harvest and 157 cows and 265 bulls have been reported in the federal harvest, for a total Nelchina harvest so far of 5,277 animals in the 2016–2017 season. This is the highest harvest since 1996, when 48,722 state permits were issued.

DEPARTMENT COMMENTS: The department is **OPPOSED** to the proposal because it will limit our ability to manage the herd by restricting harvest. When the caribou herd is above population objectives, achieving high harvest is critical to preventing further population growth. The proposal as written will limit the opportunity to maximize harvest. In many years, once the majority of the caribou herd migrates east of the Richardson Highway, little or no additional harvest is obtained. This proposal allows for a maximum of 12,000 permits to be issued for the fall season (August 10–September 20). If the herd migrates east after this time, harvest opportunity will likely be lost. If adopted, the board should consider whether a reasonable opportunity for success in harvesting a caribou for a communal pattern of use still exists, and whether a reasonable opportunity for success in harvesting Nelchina caribou for the individual pattern of use still exists.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 34 – 5 AAC 85.025 Hunting seasons and bag limits for caribou. Eliminate the community subsistence harvest hunt for caribou, increase the number of caribou household Tier I permits, and shorten the season.

PROPOSED BY: James Holmes

WHAT WOULD THE PROPOSAL DO? Eliminate the community subsistence harvest hunt for caribou (CC001), make two Tier I caribou permits per household (RC566) available when the caribou population is high, and shorten the drawing hunt season (DC485) to October 21 through March 31.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures. Currently there is no nonresident hunting season for Nelchina caribou in Unit 13.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of CSH permits that may be issued annually.
- There is a drawing permit hunt for caribou in Unit 13 (DC485). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of one caribou.
- Federally qualified subsistence users can obtain two federal caribou permits per person (FC1302). The season is August 1–September 30 and October 21–March 31 with a bag limit of one caribou per permit. Federal permits are valid for federal lands in Unit 13.

There is a positive C&T finding for the Nelchina caribou herd in Unit 13 with an ANS of 600–1,000 caribou.

Up to 300 caribou can be taken by all CSH caribou groups combined.

CSH caribou hunt participants (recipients of CC001, and all household members) must apply as part of a community group of at least 25 individuals and must make a two-year commitment abiding by an extensive list of hunt conditions, including:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration caribou hunts, or hold caribou harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Unit 11, 13, and that portion of Unit 12 south of the Little Tok River).
- After the CSH hunt has ended, if the household was unsuccessful in filling the CSH bag limit during the CSH hunt, household members may hunt in areas outside the CSH hunt area with caribou harvest tickets or other state caribou permits where the bag limit is greater than one caribou per household.
- No member of the household may hunt moose outside of the CSH hunt area.
- Any member of the household may harvest the caribou, and any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the heart, liver, kidneys, and fat, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Prior to October 1, meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by Emergency Order to one bull or one cow, or the hunt may be closed by Emergency Order.
- The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and

will not be eligible to participate in the CSH hunt during the following regulatory year but will still need to comply with the conditions of the CSH hunt.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH caribou hunt (CC001) would be eliminated for caribou in Unit 13 and the board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. The board would be providing only for the individual pattern of use. Two Tier I permits per household may increase effort and harvest, which is desirable in some years.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose and caribou hunts to provide a reasonable opportunity for the community-based pattern in addition to other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community.

The management objective for the Nelchina caribou herd is to maintain a population between 35,000 and 40,000 animals. A minimum count of the Nelchina herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

The relative ease of access to the NCH from the road system in the fall season and proximity to Alaska’s largest human population centers makes it a popular herd among hunters. For RY2016, there were 22,269 applications submitted for all Nelchina caribou permit opportunities.

When the harvest quota for Nelchina caribou is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009, including federal harvest. Nonresident hunting opportunity has not been provided since 1981.

For RY2016 the maximum number of draw permits (5,000) were issued in addition to all successful applicants of the Tier I (8,470) and the CSH hunts(1,006) for a total of 14,476 permits (Table 34-1). The Nelchina harvest quota was 4,000 caribou (2,000 cows and 2,000 bulls) for the fall 2016 season. In an effort to maximize harvest, the fall season was extended by emergency order from September 20 to September 30 for all state hunts, and the harvest quota was removed for the current winter season, which remains open until March 31. As of January 4, 2017, 2,022 cows and 2,828 bulls have been reported in the state harvest and 157 cows and 265 bulls have been reported in the federal harvest, for a total Nelchina harvest so far of 5,277 animals in the 2016–2017 season. This is the highest harvest since 1996, when 48,722 state permits were issued.

Table 34-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15.

^d Harvest is ongoing.

In RY2015 the Nelchina herd migrated east of the Richardson Highway and became virtually inaccessible shortly after the season reopened in October. During most regulatory years, 25% or less of the Nelchina harvest reported on state permits occurs after September 30 (Table 34-2).

Table 34-2. Nelchina caribou harvest on state permits (RC566, CC001, DC480–485)

Regulatory Year	State Harvest	Harvest after Sept 30	Percent of Harvest
2009	404	102	25%
2011	2,032	218	11%
2012	3,715	927	25%
2013	2,296	0	0%
2014	2,711	365	13%
2015	3,396	147	4%

DEPARTMENT COMMENTS: The department is **NEUTRAL** on eliminating the CSH hunt and on issuing two Tier I household permits during years when high harvest is deemed necessary. The board should consider whether reasonable opportunity for success in harvesting a moose or caribou for the communal pattern of use still exists, as well as reasonable opportunity for success in harvesting caribou for the individual pattern of use still exists. If this proposal is adopted, the department requests the board develop a threshold to determine when two permits per household may be issued, and that the board delegate authority to the department to make that decision after summer census and composition surveys are completed (rather than prior to the Tier I application deadline). It can be expected that Tier I participation will increase if two registration permits are available to each household.

The department is **OPPOSED** to the proposal of limiting the draw hunting season to October 21 through March 31. In years when the herd migrates early, draw hunters may have little or no opportunity to

harvest a caribou which will likely affect our ability to meet harvest objectives and regulate population size.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 35 – 5 AAC 85.025 Hunting seasons and bag limits for moose; and 92.050(a)(4)(I).
Required permit hunt conditions and procedures. Eliminate the community subsistence harvest hunt for moose and remove the requirement for Tier I caribou hunters to hunt moose in Unit 13.

PROPOSED BY: Jennifer Bondy

WHAT WOULD THE PROPOSAL DO? Eliminate the community subsistence harvest hunt for moose (CM300) and allow Tier I caribou hunters to hunt moose outside of Unit 13.

WHAT ARE THE CURRENT REGULATIONS? The Board of Game has made a positive C&T use finding for moose in Unit 13 with an ANS of 300–600 moose. Hunters who wish to hunt moose in Unit 13 may do so under the following seasons and bag limits:

- CSH participants have a bag limit of one bull from August 10–September 20 (CM300). The board has established an allocation of 100 bull moose that do not meet antler restrictions to the Copper Basin CSH. Once the 100 bull allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines. Each CSH group is limited to one any-bull for every three households.
- Resident hunters with harvest tickets for Unit 13 may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters who successfully draw a Unit 13 bull moose drawing permit (DM324) are permitted one bull from September 1–20; up to 5 permits may be issued.
- Resident hunters who successfully draw a Unit 13 antlerless moose drawing permit (DM325) are allowed to harvest one antlerless moose from October 1–31 or March 1–31; up to 200 permits may be issued.
- Federally qualified subsistence users can obtain a federal moose permit (FM1301). The season is August 1–September 20 with a bag limit of one antlered bull moose per household for residents that qualify for 13E, or one antlered bull moose per hunter for residents that qualify for the remainder of Unit 13. Federal permits are valid for federal lands only.
- Nonresident hunters who successfully draw a Unit 13 drawing permit (DM335–DM339) are permitted one bull with 50-inch antlers or antlers with four or more brow tines on one side from September 1–20; up to 150 permits may be issued.

Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures:

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou

per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.

- Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of CSH permits that may be issued annually.
- There is a drawing permit hunt for caribou in Unit 13 (DC485). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of one caribou.
- Federally qualified subsistence users can obtain two federal caribou permits per person (FC1302). The season is August 1–September 30 and October 21–March 31 with a bag limit of one caribou per permit. Federal permits are valid for federal lands in Unit 13.

There is a positive C&T finding for the Nelchina caribou herd (NCH) in Unit 13 with an ANS of 600–1,000 caribou.

Tier I Nelchina caribou hunt participants (recipients of RC566 and all household members) must abide by the following hunt conditions:

- No member of the household will be eligible to apply for or receive any other caribou permits.
- No member of the household may hunt caribou outside of Unit 13.
- No member of the household will be eligible to apply for or receive any moose permits outside of Unit 13.
- No member of the household may hunt moose outside of Unit 13.
- Any member of the household may harvest the caribou.
- Prior to Oct. 1, meat of the forequarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by Emergency Order to one bull or one cow, or the hunt may be closed by Emergency Order.
- No member of the household may proxy hunt for caribou or moose outside of Unit 13.
- Hunters can only proxy hunt for one Unit 13 caribou per regulatory year.
- Proxy hunters for RC566 caribou must abide by the hunt conditions of the RC566 permit and cannot hunt moose or caribou outside of Unit 13 for the regulatory year.
- CSH hunters are not eligible to proxy hunt for RC566 permits.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The CSH moose hunt (CM300) would be eliminated as a hunt option for moose in Unit 13 and the board may no longer be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation. The board would only be providing for the individual pattern of use. Every resident that applied for the Tier I caribou hunt would receive one permit per household and would be allowed to hunt moose anywhere in the state, with no cap on the number of permits issued.

BACKGROUND:

Moose

In 2011 the board recognized there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose hunt to provide a reasonable opportunity for the community-based pattern and other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions), the winter registration any bull moose hunt, and drawing hunts.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 35-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 35-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^a The community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including an average of 81 bulls that do not meet antler restrictions (“any-bull”) since 2009. Hunters harvested an average of 898 moose annually during the same period. Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity (Figure 35-1).

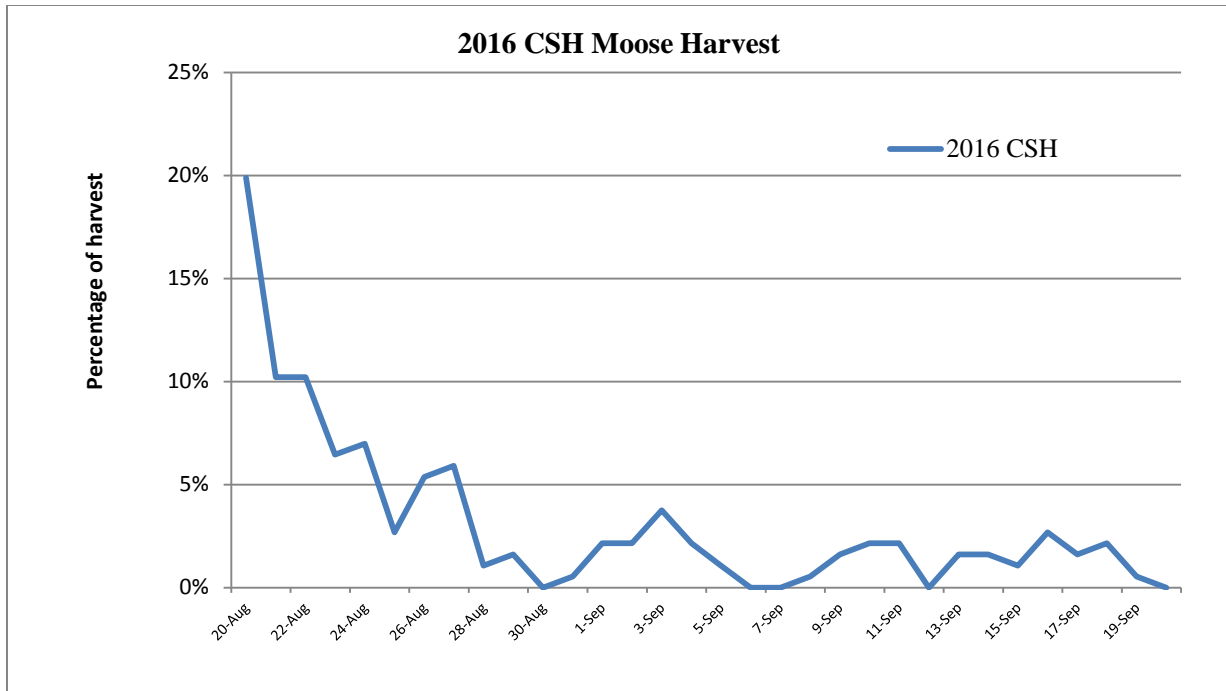


Figure 35-1. Moose harvest chronology in the CSH, RY2016.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 35-2). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the observed bull ratio was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 35-2. Unit 13 moose population objectives and 2015 estimates

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

Caribou

The management objective for the Nelchina caribou herd (NCH) is to maintain a population between 35,000 and 40,000 animals. A minimum count of the Nelchina herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

The relative ease of access to the Nelchina caribou herd from the road system in the fall season makes it a popular herd among hunters. For RY2016 there were 22,269 applications submitted for all Nelchina caribou permit opportunities.

When the harvestable surplus for Nelchina caribou is above ANS (1,000 caribou), hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009, including federal harvest. Nonresident hunting opportunity has not been provided since 1981.

Tier I caribou permits include the requirement that participants hunt moose only in Unit 13, with the intention of providing hunt conditions in alignment with board findings that a communal pattern of use included close ties to the community hunt area, and reliance on a wide variety of resources from that hunt area. Since the implementation of the Tier I caribou permit in 2009, Tier I applicants and permit recipients have steadily increased (Table 35-3). Moose hunter numbers in Unit 13 have not demonstrated the same rate of increase (Figure 35-2). The average annual moose hunter success rate since implementation of the Tier I caribou permit remains high (18%) and changes in moose hunter success more closely relate to the number of moose hunters than number of Tier I caribou permit recipients.

Table 35-3. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15.

^d Harvest is ongoing.

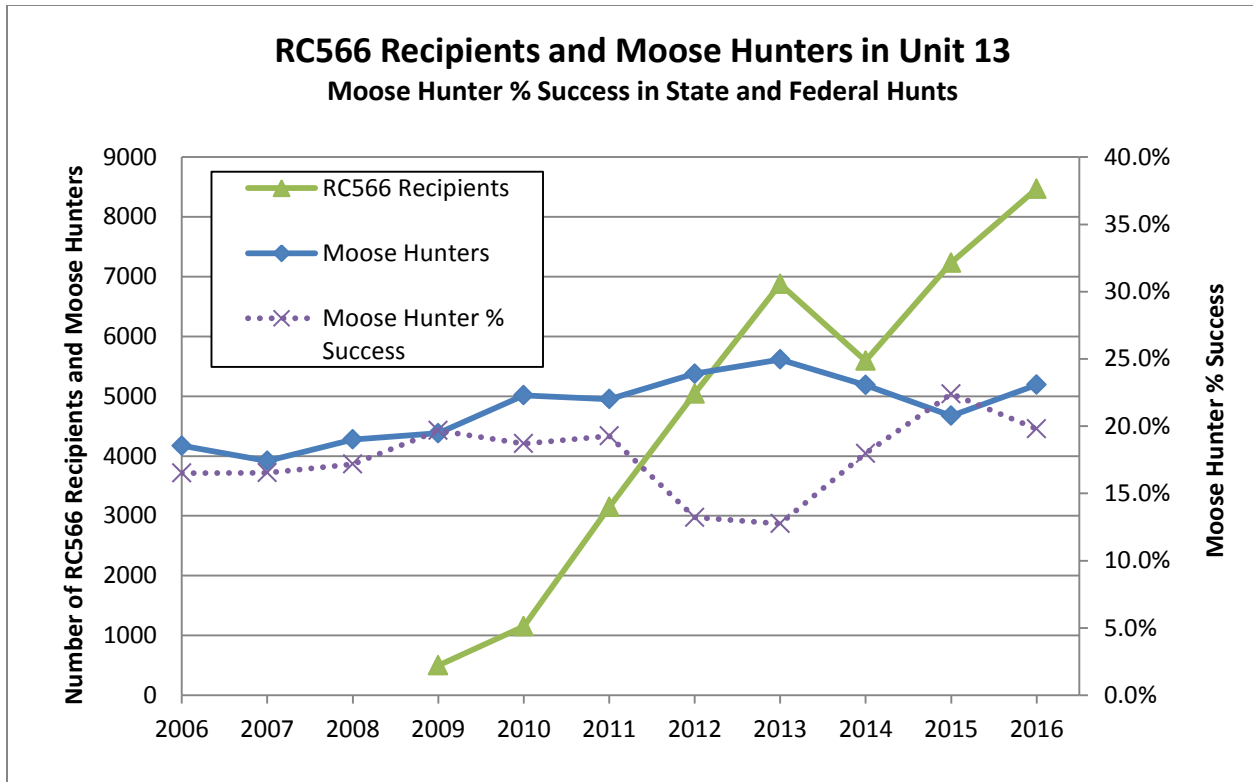


Figure 35-2. Number of RC566 recipients, moose hunters who reported hunting and total moose hunt success rates for Unit 13.

For RY2016, the maximum number of caribou draw permits (5,000) were issued in addition to household permits for all successful applicants of the Tier I (8,470) and the CSH hunts(1,006) for a total of 14,476 permits (Table xx). The Nelchina harvest quota was 4,000 caribou (2,000 cows and 2,000 bulls) for the fall 2016 season. In an effort to maximize harvest, the fall season was extended by emergency order from September 20 to September 30 for all state hunts, and the harvest quota was removed for the current winter season, which remains open until March 31st. As of January 4, 2017, 2,022 cows and 2,828 bulls have been reported in the state harvest and 157 cows and 265 bulls have been reported in the federal harvest for a total Nelchina harvest so far of 5,277 animals in the 2016-2017 season. This is the highest harvest since 1996, when 48,722 state permits were issued.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose in the CSH hunt area. If adopted, the board should consider whether a reasonable opportunity for success in harvesting a moose for a communal pattern of use still exists, and whether a reasonable opportunity for success in harvesting moose for the individual pattern of use still exists.

Removing the moose hunting restriction on the Tier I caribou permit will increase harvest pressure on the moose population. Current data do not indicate that the Tier I caribou permit restriction has increased moose hunting pressure in Unit 13. However, the restriction does limit the number of Tier I applicants because hunters who want to hunt moose outside of Unit 13 are more likely to apply for the caribou draw permit instead of the Tier I registration hunt, which does not limit participation. By removing the moose

hunting restriction from the Tier I caribou registration hunt, the Tier I permit will become an unlimited registration permit, and all residents who desire the opportunity to hunt Nelchina caribou, aside from those participating in the CSH caribou hunt, will apply for and receive a household Tier I caribou permit. Due to the high demand for Nelchina caribou permits, 20,000 or more permits would be issued annually under the proposed hunt structure. Even though the population is above the management objectives and a large harvest is needed to manage the herd, this situation is not likely to continue, whereas permit demand will remain high. Excessive caribou permit numbers may result in early season closures by emergency order, increased crowding in the field, and increased complaints from the public regarding hunt quality and opportunity, and the board should consider if these effects would have an effect on reasonable opportunity for success in harvesting a caribou for subsistence uses.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 36 – 5 AAC 85.025 Hunting seasons and bag limits for caribou. Increase the bag limit for the caribou community harvest hunt (CC001), extend the season, and clarify the communities eligible for receiving the 300 caribou quota.

PROPOSED BY: Ahtna Tene Nené

WHAT WOULD THE PROPOSAL DO? Increase CSH caribou bag limit to two caribou per household, extend the CSH caribou season, and re-allocate the current CSH quota of 300 caribou to communities specified in 5AAC 92.074(d).

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures. Currently there is no nonresident hunting season for Nelchina caribou in Unit 13.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- CSH permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of CSH permits that may be issued annually.
- There is a drawing permit hunt for caribou in Unit 13 (DC485). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of one caribou.
- Federally qualified subsistence users can obtain two federal caribou permits per person (FC1302). The season is August 1–September 30 and October 21–March 31 with a bag limit of one caribou per permit. Federal permits are valid for federal lands in Unit 13.

There is a positive C&T finding for the Nelchina caribou herd in Unit 13 with an ANS of 600–1,000 caribou.

Up to 300 caribou can be taken by all CSH caribou groups combined.

CSH caribou hunt participants (recipients of CC001, and all household members) must apply as part of a community group of at least 25 individuals and must make a two-year commitment abiding by an extensive list of hunt conditions, including:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration caribou hunts, or hold caribou harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Unit 11, 13, and that portion of Unit 12 south of the Little Tok River).
- After the CSH hunt has ended, if the household was unsuccessful in filling the CSH bag limit during the CSH hunt, household members may hunt in areas outside the CSH hunt area with caribou harvest tickets or other state caribou permits where the bag limit is greater than one caribou per household.
- No member of the household may hunt moose outside of the CSH hunt area.
- Any member of the household may harvest the caribou, and any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the heart, liver, kidneys, and fat, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Prior to October 1, meat of the forequarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by Emergency Order to one bull or one cow, or the hunt may be closed by Emergency Order.
- The group coordinator must submit an annual Coordinator Community Harvest Report. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year but will still need to comply with the conditions of the CSH hunt.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The harvest of the CSH quota of 300 caribou would be allocated to participants from the eight communities for which the CSH hunt was originally designed—unless the board took action, there would be no caribou quota for CSH participants outside of those communities. The fall CSH caribou season close date would change from September 20 to September 30. Caribou CSH participants would have a bag limit of two caribou per household while bag limits for other Unit 13 caribou hunts would remain the same.

BACKGROUND: In 2006-170-BOG and 2011-184-BOG, the board recognized there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose and caribou hunts to provide a reasonable opportunity for the community-based pattern in addition to other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community.

The management objective for the NCH is to maintain a population between 35,000 and 40,000 animals. A minimum count of the herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

When the harvest quota for Nelchina caribou is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009 – including federal harvest. Nonresident hunting opportunity has not been provided since 1981.

Participation in the CSH caribou hunt has increased since the hunt became available to any resident group of at least 25 individuals (Table 36-1). CSH caribou harvest has not met the 300 caribou quota in the past, but is currently approaching the quota in the 2016-17 hunting season.

Table 36-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 permits were issued for a winter hunt (TC566).

^c State hunts were closed by emergency order on October 15.

^d Harvest is ongoing.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of caribou hunting opportunity. Caribou harvest is not expected to change considerably by allocating the original CSH quota to the eight communities because Tier I and draw opportunities would still be available to all current CSH participants. The structure of the CSH hunt allows any member of a caribou group to harvest caribou with one or more permits from any other household in the group, but the harvest of a caribou is reported on less than 30–40% of the permits issued. Therefore, increasing the bag limit to two caribou per household

is not expected to significantly increase the number of caribou harvested in the CSH hunt. As written, the proposal would align the CC001 season with the federal subsistence season.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 37 – 5 AAC 85.025 Hunting seasons and bag limits for caribou. Lengthen the caribou season, increase the winter caribou bag limit, and establish a youth hunting season.

PROPOSED BY: Jennifer Bondy

WHAT WOULD THE PROPOSAL DO? This proposal appears to apply to all caribou hunts in Unit 13. As such, the season dates for all hunts would be liberalized to August 10–March 31 with no closure during the caribou rutting season. The bag limit would be one caribou for all hunts August 10–September 30, while the October 1–March 31 season would have a two caribou bag limit. A youth hunt also would be established for August 1–20: this would overlap the other caribou hunting opportunities that open on August 10.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures. Currently there is no nonresident hunting season for Nelchina caribou in Unit 13.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of CSH permits that may be issued annually.
- There is a drawing permit hunt for caribou in Unit 13 (DC485). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of one caribou.
- Federally qualified subsistence users can obtain two federal caribou permits per person (FC1302). The season is August 1–September 30 and October 21–March 31 with a bag limit of one caribou per permit. Federal permits are valid for federal lands in Unit 13.

There is a positive C&T finding for the Nelchina caribou herd in Unit 13 with an ANS of 600–1,000 caribou.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The resident hunting season would be extended until March 31 with no closed period during the rut under the existing hunt structure. After October 1, the bag limit would increase to two caribou if the harvest quota has not yet been met and there are still caribou available in the hunt area. It is unclear if the proposal seeks to

separate the two hunt periods under separate hunts and if the total bag limit for caribou is increased to two or three caribou per resident hunter. In addition to the caribou permit options currently available and proposed here, an early season youth hunt would be created for August 1–20, presumably under a draw system.

BACKGROUND: The management objective for the Nelchina caribou herd is to maintain a population between 35,000 and 40,000 animals. A minimum count of the Nelchina herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

The relative ease of access to the Nelchina caribou herd from the road system in the fall season and proximity to Alaska’s largest human population centers makes it a popular herd among hunters. For RY 2016, there were 22,269 applications submitted for all Nelchina caribou permit opportunities.

When the harvest quota for Nelchina caribou is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009 – including federal harvest. Nonresident hunting opportunity has not been provided since 1981.

For RY 2016 the maximum number of draw permits (5,000) were issued in addition to all successful applicants of the Tier I (8,470) and the CSH hunts(1,006), for a total of 14,476 permits (Table 37-1). The Nelchina harvest quota was 4,000 caribou (2,000 cows and 2,000 bulls) for the fall 2016 season. In an effort to maximize harvest, the fall season was extended by emergency order from September 20 to September 30 for all state hunts, and the harvest quota was removed for the current winter season, which remains open until March 31. As of January 4, 2017, 2,022 cows and 2,828 bulls have been reported in the state harvest and 157 cows and 265 bulls have been reported in the federal harvest, for a total Nelchina harvest so far of 5,277 animals in the 2016–2017 season. This is the highest harvest since 1996, when 48,722 state permits were issued.

Table 37-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15.

^d Harvest is ongoing.

In RY2015 the Nelchina herd migrated east of the Richardson Highway and became virtually inaccessible shortly after the season reopened in October. During most regulatory years, less than 25% of the Nelchina harvest reported on state permits occurs after September 30 (Table 37-2).

Table 37-2. Nelchina caribou harvest on state permits (RC566, CC001, DC480–485)

Regulatory Year	State Harvest	Harvest after Sept 30 th	Percent of Harvest
2009	404	102	25%
2011	2,032	218	11%
2012	3,715	927	25%
2013	2,296	0	0%
2014	2,711	365	13%
2015	3,396	147	4%

Since the implementation of the Tier I caribou permit in 2009, Tier I applicants and permit recipients have steadily increased (Table 37-1). Numbers of moose hunters in Unit 13 have not demonstrated the same rate of increase (Figure 37-1). The average annual moose hunter success rate since implementation of the Tier I caribou permit remains high (18%) and changes in moose hunter success more closely relate to number of moose hunters than number of Tier I caribou permit recipients.

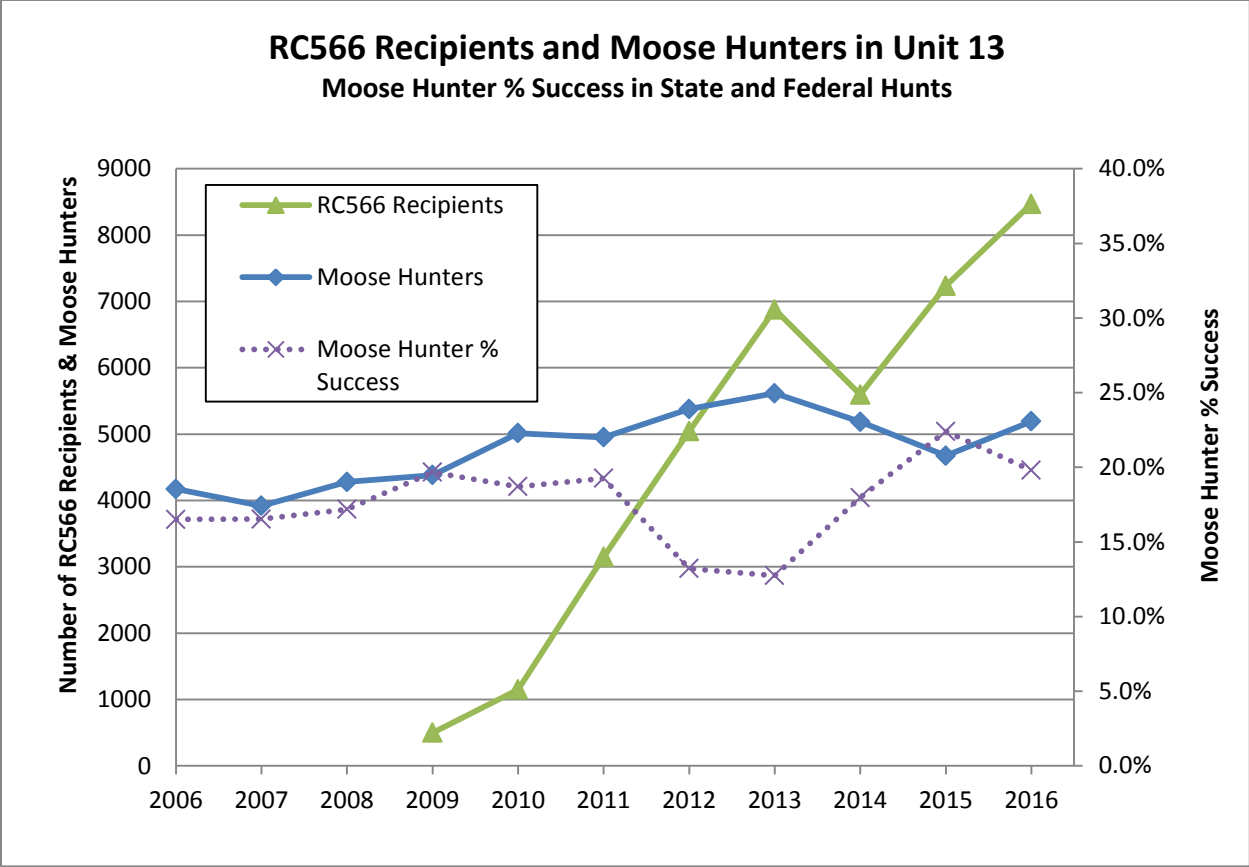


Figure 37-1. Number of RC566 permit recipients, moose hunters that reported hunting in Unit 13, and total moose hunt success rates for Unit 13.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of caribou hunting opportunity. Increasing the caribou bag limit to two caribou starting October 1 is not expected to increase caribou harvest because very little harvest occurs after the majority of the caribou herd migrates east of the Richardson highway. However, if the increased winter bag limit persuades hunters to forego caribou hunting during the moose season, caribou harvest may be reduced if hunters do not participate in the hunt when the caribou are accessible.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 38 – 5 AAC 85.025 Hunting seasons and bag limits for caribou; 92.050 (a)(4)(I) Required permit hunt conditions and procedures. Eliminate drawing hunt for caribou in Unit 13 and remove the requirement that Unit 13 Tier I caribou hunters shall hunt moose in Unit 13.

PROPOSED BY: Adam Durland

WHAT WOULD THE PROPOSAL DO? Eliminate the drawing hunt opportunity for Nelchina caribou and allow Tier I caribou hunters to hunt moose outside of Unit 13.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures. Currently there is no nonresident hunting season for Nelchina caribou in Unit 13.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of CSH permits that may be issued annually.
- There is a drawing permit hunt for caribou in Unit 13 (DC485). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of one caribou.
- Federally qualified subsistence users can obtain two federal caribou permits per person (FC1302). The season is August 1–September 30 and October 21–March 31 with a bag limit of one caribou per permit. Federal permits are valid for federal lands in Unit 13.

The Board of Game has made a positive C&T use finding for the Nelchina caribou herd (NCH) in Unit 13 with an ANS of 600–1,000 caribou.

Tier I Nelchina caribou hunt participants (recipients of RC566 and all household members) must abide by the following hunt conditions:

- No member of the household will be eligible to apply for or receive any other caribou permits.
- No member of the household may hunt caribou outside of Unit 13.
- No member of the household will be eligible to apply for or receive any moose permits outside of Unit 13.
- No member of the household may hunt moose outside of Unit 13.
- Any member of the household may harvest the caribou.
- Prior to Oct. 1, meat of the forequarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by Emergency Order to one bull or one cow, or the hunt may be closed by Emergency Order.
- No member of the household may proxy hunt for caribou or moose outside of Unit 13.
- Hunters can only proxy hunt for one Unit 13 caribou per regulatory year.
- Proxy hunters for RC566 caribou must abide by the hunt conditions of the RC566 permit and cannot hunt moose or caribou outside of Unit 13 for the regulatory year.
- CSH hunters are not eligible to proxy hunt for RC566 permits.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? RC566 and CC001 would be the only opportunities for Alaska residents to hunt Nelchina caribou. Every resident who applied for the Tier I caribou hunt would receive one permit per household and would be allowed to hunt moose anywhere in the state, and there would be no cap on the number of Tier I caribou registration permits issued.

BACKGROUND: The management objective for the NCH is to maintain a population between 35,000 and 40,000 animals. A minimum count of the Nelchina herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

The relative ease of access to the Nelchina caribou herd from the road system in the fall season and proximity to Alaska’s largest human population centers makes it a popular herd among hunters. For RY2016 there were 22,269 applications submitted for all Nelchina caribou permit opportunities.

When the harvest quota for Nelchina caribou is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts. Since the implementation of the Tier I caribou permit in 2009, Tier I applicants and permit recipients have steadily increased (Table 38-1).

Table 38-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755 ^c	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^c	5,000	1,631 ^c	-	14,476	5,277 ^c

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15.

^d Harvest is ongoing.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009 – including federal harvest. Nonresident hunting opportunity has not been provided since 1981.

For RY2016, the maximum number of draw permits (5,000) were issued, in addition to household permits for all successful applicants of the Tier I (8,470) and the CSH hunts(1,006), for a total of 14,476 permits (Table 38-1). The Nelchina harvest quota was 4,000 caribou (2,000 cows and 2,000 bulls) for the fall

2016 season. In an effort to maximize harvest, the fall season was extended by emergency order from September 20 to September 30 for all state hunts, and the harvest quota was removed for the winter season, which remains open. As of January 4, 2017, 2,022 cows and 2,828 bulls have been reported in the state harvest and 157 cows and 265 bulls have been reported in the federal harvest, for a total Nelchina harvest so far of 5,277 animals in the 2016–2017 season. This is the highest harvest since 1996, when 48,722 state permits were issued.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose and caribou and the elimination of the draw hunt. Removing the moose hunting restriction from the Tier I caribou permit will essentially become an unlimited registration permit hunt; and all residents who desire the opportunity to hunt Nelchina caribou will apply for, and receive, a household Tier I caribou permit. With the high demand for Nelchina permits, 20,000 permits or more could conceivably be issued annually under this system. Even though the Nelchina herd is currently above management objectives, the current situation will not continue indefinitely, whereas permit demand is expected to remain high. Excessive permit numbers may result in early season closures by emergency order, increased crowding in the field, and increased complaints from the public regarding hunt quality and opportunity.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSALS 39 & 40 – 92.050 (a)(4)(I) Required permit hunt conditions and procedures. Remove the requirement that Unit 13 Tier I caribou hunters shall hunt moose in Unit 13.

PROPOSED BY:

- Claude Bondy (Proposal 39) Issue: Over-harvest of moose.
- Kenneth Ray (Proposal 40) Issue: Over-harvest of moose.

WHAT WOULD THE PROPOSALS DO? Allow Tier I caribou hunters to hunt moose outside of Unit 13.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures. Currently there is no nonresident hunting season for Nelchina caribou in Unit 13.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of CSH permits that may be issued annually.

- There is a drawing permit hunt for caribou in Unit 13 (DC485). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of one caribou.
- Federally qualified subsistence users can obtain two federal caribou permits per person (FC1302). The season is August 1–September 30 and October 21–March 31 with a bag limit of one caribou per permit. Federal permits are valid for federal lands in Unit 13.

The Board of Game has made a positive C&T use finding for the Nelchina caribou herd (NCH) in Unit 13 with an ANS of 600–1,000 caribou.

Tier I Nelchina caribou hunt participants (recipients of RC566 and all household members) must abide by the following hunt conditions:

- No member of the household will be eligible to apply for or receive any other caribou permits.
- No member of the household may hunt caribou outside of Unit 13.
- No member of the household will be eligible to apply for or receive any moose permits outside of Unit 13.
- No member of the household may hunt moose outside of Unit 13.
- Any member of the household may harvest the caribou.
- Prior to Oct. 1, meat of the forequarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by emergency order to one bull or one cow, or the hunt may be closed by emergency order.
- No member of the household may proxy hunt for caribou or moose outside of Unit 13.
- Hunters can only proxy hunt for one Unit 13 caribou per regulatory year.
- Proxy hunters for RC566 caribou must abide by the hunt conditions of the RC566 permit and cannot hunt moose or caribou outside of Unit 13 for the regulatory year.
- CSH hunters are not eligible to proxy hunt for RC566 permits.

WHAT WOULD BE THE EFFECT IF THE PROPOSALS WERE ADOPTED? Every resident who applies for the Tier I caribou hunt would receive one permit per household and would be allowed to hunt moose anywhere in the state.

BACKGROUND: The management objective for the Nelchina caribou herd (NCH) is to maintain a population between 35,000 and 40,000 animals. A minimum count of the Nelchina herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

The relative ease of access to the Nelchina caribou herd from the road system in the fall season makes it a popular herd among hunters. For RY2016 there were 22,269 applications submitted for all Nelchina caribou permit opportunities.

When the harvest quota for Nelchina caribou is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus hunt structure is composed of resident-only hunts,

which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009, including federal harvest. Nonresident hunting opportunity has not been provided since 1981.

Tier I caribou permits include the requirement that participants hunt moose only in Unit 13, with the intention of providing hunt conditions in alignment with board findings that a communal pattern of use included close ties to the community hunt area, and reliance on a wide variety of resources from that hunt area. Since the implementation of the Tier I caribou permit in 2009, Tier I applicants and permit recipients have steadily increased (Table 40-1). Moose hunter numbers in Unit 13 have not demonstrated the same rate of increase (Figure 40-1). The average annual moose hunter success rate since implementation of the Tier I caribou permit remains high (18%) and changes in moose hunter success more closely relate to the number of moose hunters than the number of Tier I caribou permit recipients.

Table 40-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15.

^d Harvest is ongoing.

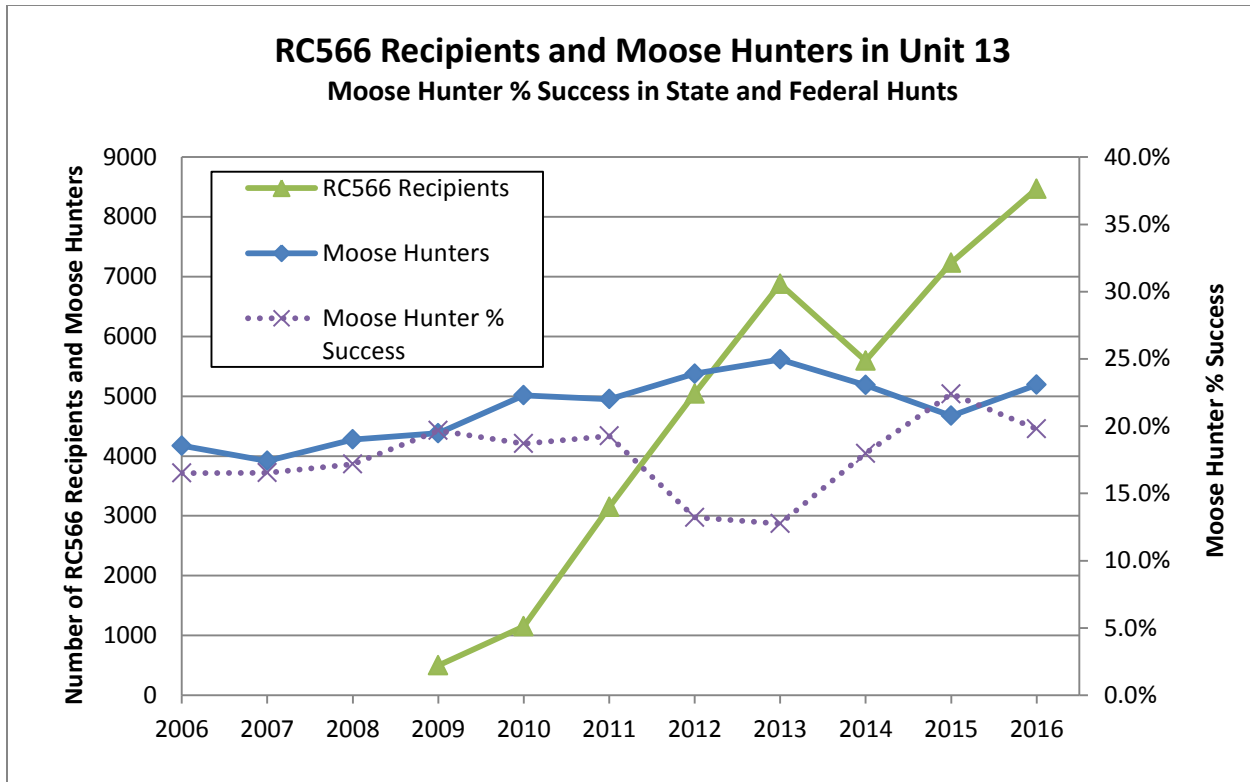


Figure 40-1. Number of RC566 recipients, moose hunters who reported hunting and total moose hunt success rates for Unit 13.

For RY2016, the maximum number of caribou draw permits (5,000) were issued in addition to household permits for all successful applicants of the Tier I (8,470) and the CSH hunts(1,006) for a total of 14,476 permits (Table 40-1). The Nelchina harvest quota was 4,000 caribou (2,000 cows and 2,000 bulls) for the fall 2016 season. In an effort to maximize harvest, the fall season was extended by emergency order from September 20 to September 30 for all state hunts, and the harvest quota was removed for the current winter season, which remains open until March 31. As of January 4, 2017, 2,022 cows and 2,828 bulls have been reported in the state harvest and 157 cows and 265 bulls have been reported in the federal harvest, for a total Nelchina harvest so far of 5,277 animals in the 2016–2017 season. This is the highest harvest since 1996, when 48,722 state permits were issued.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of hunting opportunity. The available data does not indicate that the relationship between the Tier I caribou permit and moose hunting is increasing moose hunting pressure in Unit 13; however, the restriction does limit the number of Tier I applicants, because hunters that want to hunt moose outside of Unit 13 are more likely to apply for the limited caribou draw permit hunts. By removing the moose hunting restriction from the Tier I caribou permit, the Tier I permit will essentially become a registration permit, and all residents that desire the opportunity to hunt Nelchina caribou will apply for and receive a household Tier I caribou permit.

With the high demand for Nelchina permits, 20,000 permits or more could conceivably be issued annually under this system. Even though the Nelchina herd is currently above management objectives, the current

situation will not continue indefinitely, whereas permit demand is expected to remain high. Excessive permit numbers may result in early season closures by emergency order, increased crowding in the field, and increased complaints from the public regarding hunt quality and opportunity.

COST ANALYSIS: Adoption of these proposals is not expected to result in additional costs to the department.

PROPOSAL 41 –5 AAC 85.025 Hunting seasons and bag limits for caribou; and 92.050 (a)(4)(I) Required permit hunt conditions and procedures. Shorten the season dates for the Unit 13 caribou draw hunt and remove the requirement that Unit 13 Tier I caribou hunters shall hunt moose in Unit 13.

PROPOSED BY: Travis Price

WHAT WOULD THE PROPOSAL DO? This proposal would shorten the caribou draw season dates to a two week period and allow Tier I caribou hunters to hunt moose outside of Unit 13.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures. Currently there is no nonresident hunting season for Nelchina caribou in Unit 13.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.
- Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of CSH permits that may be issued annually.
- There is a drawing permit hunt for caribou in Unit 13 (DC485). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of one caribou.
- Federally qualified subsistence users can obtain two federal caribou permits per person (FC1302). The season is August 1–September 30 and October 21–March 31 with a bag limit of one caribou per permit. Federal permits are valid for federal lands in Unit 13.

The Board of Game has made a positive C&T use finding for the Nelchina caribou herd (NCH) in Unit 13 with an ANS of 600–1,000 caribou.

Tier I Nelchina caribou hunt participants (recipients of RC566 and all household members) must abide by the following hunt conditions:

- No member of the household will be eligible to apply for or receive any other caribou permits.
- No member of the household may hunt caribou outside of Unit 13.

- No member of the household will be eligible to apply for or receive any moose permits outside of Unit 13.
- No member of the household may hunt moose outside of Unit 13.
- Any member of the household may harvest the caribou.
- Prior to Oct. 1, meat of the forequarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.
- The one caribou bag limit may be changed by emergency order to one bull or one cow, or the hunt may be closed by emergency order.
- No member of the household may proxy hunt for caribou or moose outside of Unit 13.
- Hunters can only proxy hunt for one Unit 13 caribou per regulatory year.
- Proxy hunters for RC566 caribou must abide by the hunt conditions of the RC566 permit and cannot hunt moose or caribou outside of Unit 13 for the regulatory year.
- CSH hunters are not eligible to proxy hunt for RC566 permits.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Season dates for Nelchina caribou permits would be limited to a two week hunt period; and Tier I caribou hunters would be allowed to hunt moose anywhere in the state.

BACKGROUND: The management objective for the Nelchina caribou herd (NCH) is to maintain a population between 35,000 and 40,000 animals. A minimum count of the Nelchina herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

The relative ease of access to the Nelchina caribou herd from the road system in the fall season makes it a popular herd among hunters. For RY2016 there were 22,269 applications submitted for all Nelchina caribou permit opportunities.

When the harvest quota for Nelchina caribou is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009, including federal harvest. Nonresident hunting opportunity has not been provided since 1981.

Tier I caribou permits include the requirement that participants hunt moose only in Unit 13, with the intention of providing hunt conditions in alignment with board findings that a communal pattern of use included close ties to the community hunt area, and reliance on a wide variety of resources from that hunt area. Since the implementation of the Tier I caribou permit in 2009, Tier I applicants and permit recipients have steadily increased (Table 41-1). Moose hunter numbers in Unit 13 have not demonstrated the same rate of increase (Figure 41-1). The average annual moose hunter success rate since implementation of the Tier I caribou permit remains high (18%) and changes in moose hunter success more closely relate to number of moose hunters than number of Tier I caribou permit recipients.

Table 41-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	403	150	3,001	1,023	5,500	8,449	4,430
2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15.

^d Harvest is ongoing.

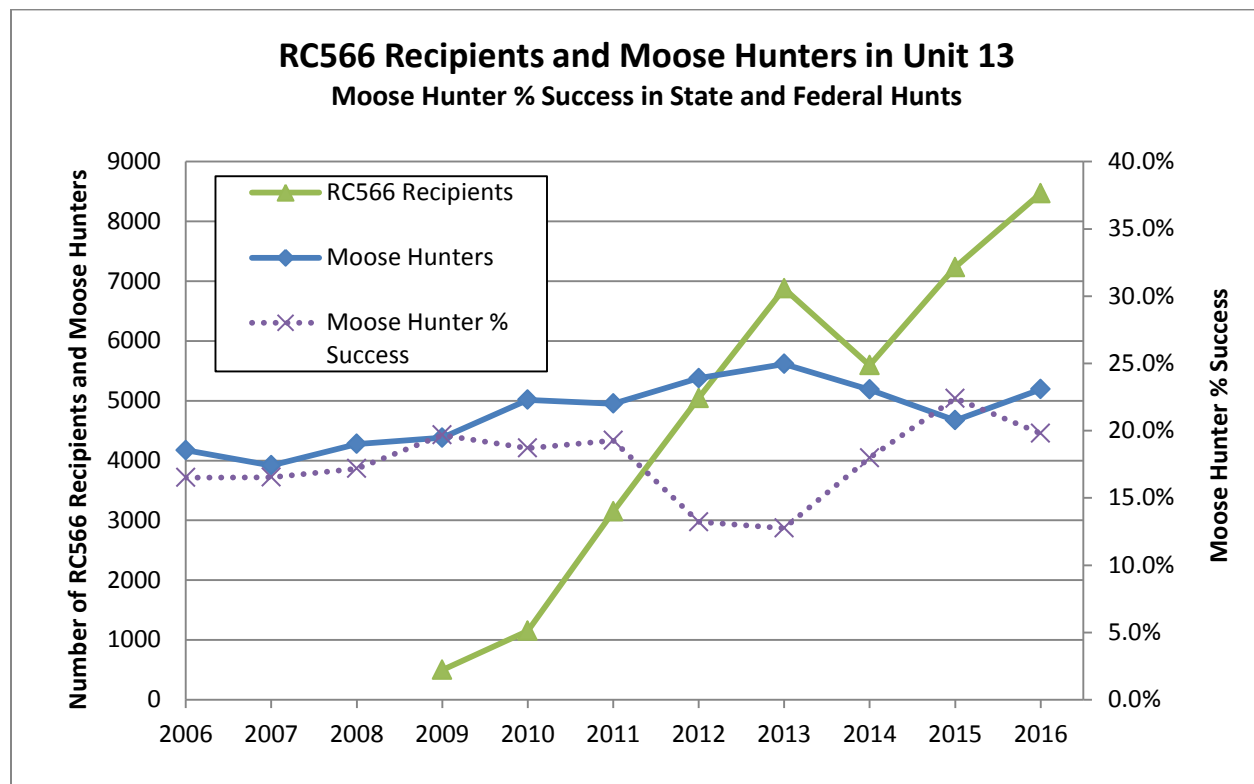


Figure 41-1. Number of RC566 recipients, moose hunters who reported hunting and total moose hunt success rates for Unit 13.

For RY2016, the maximum number of caribou draw permits (5,000) were issued in addition to household permits for all successful applicants of the Tier I (8,470) and the CSH hunts(1,006) for a total of 14,476 permits (Table 41-1). The Nelchina harvest quota was 4,000 caribou (2,000 cows and 2,000 bulls) for the fall 2016 season. In an effort to maximize harvest, the fall season was extended by emergency order from September 20 to September 30 for all state hunts, and the harvest quota was removed for the current winter season, which remains open until March 31. As of January 4, 2017, 2,022 cows and 2,828 bulls have been reported in the state harvest and 157 cows and 265 bulls have been reported in the federal harvest for a total Nelchina harvest so far of 5,277 animals in the 2016–2017 season. This is the highest harvest since 1996, when 48,722 state permits were issued.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of hunting opportunity. The available data does not indicate that the relationship between the Tier I caribou permit and moose hunting is increasing moose hunting pressure in Unit 13; however, the restriction does limit the number of Tier I applicants because hunters who want to hunt moose outside of Unit 13 are more likely to apply for the limited caribou draw permit hunts. By removing the moose hunting restriction from the Tier I caribou permit, the Tier I permit will essentially become a registration permit, and all residents who desire the opportunity to hunt Nelchina caribou will apply for and receive a household Tier I caribou permit.

With the high demand for Nelchina permits, 20,000 permits or more could conceivably be issued annually under this system. Even though the Nelchina herd is currently above management objectives, the current situation will not continue indefinitely, whereas permit demand is expected to remain high. Excessive permit numbers may result in early season closures by emergency order, increased crowding in the field, and increased complaints from the public regarding hunt quality and opportunity.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 42 – 5 AAC 85.025 Hunting seasons and bag limits for caribou. Change the dates for the Unit 13 caribou draw season.

PROPOSED BY: Douglas Sickles

WHAT WOULD THE PROPOSAL DO? Restrict caribou draw permit hunting season to a fall season of August 20–September 20 only.

WHAT ARE THE CURRENT REGULATIONS? Resident hunters are allowed to participate in the Nelchina caribou hunt by subscribing to one of three state permit hunt structures. Currently there is no nonresident hunting season for Nelchina caribou in Unit 13.

- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of Tier I caribou registration permits that may be issued annually.

- Community Subsistence Harvest (CSH) permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20 and October 21–March 31 with a bag limit of one caribou per household. There is no cap on number of CSH permits that may be issued annually.
- There is a drawing permit hunt for caribou in Unit 13 (DC485). Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20 and October 21–March 31 with a bag limit of one caribou.
- Federally qualified subsistence users can obtain two federal caribou permits per person (FC1302). The season is August 1–September 30 and October 21–March 31 with a bag limit of one caribou per permit. Federal permits are valid for federal lands in Unit 13.

The Board of Game has made a positive C&T use finding for the Nelchina caribou herd (NCH) in Unit 13 with an ANS of 600–1,000 caribou.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? Hunters with Unit 13 draw tags for caribou would be restricted to hunting the fall season only. This change is not expected to reduce harvest significantly because very few caribou are taken during the winter season.

BACKGROUND: The management objective for the Nelchina caribou herd (NCH) is to maintain a population between 35,000 and 40,000 animals. A minimum count of the Nelchina herd in the summer of 2016 observed 49,950 animals. Composition surveys conducted during October 2016 observed ratios of 56 bulls:100 cows and 48 calves:100 cows.

The relative ease of access to the NCH from the road system in the fall season and proximity to Alaska’s largest human population centers makes it a popular herd among hunters. For RY2016, there were 22,269 applications submitted for all Nelchina caribou permit opportunities.

When the harvest quota for Nelchina caribou is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The Tier I Plus hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt, CC001, and Tier I registration hunt, RC566) and resident-only drawing permit hunts.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009, including federal harvest. Nonresident hunting opportunity has not been provided since 1981.

For RY2016 the maximum number of draw permits (5,000) were issued, in addition to all successful applicants of the Tier I (8,470) and the CSH hunts(1,006), for a total of 14,476 permits (Table 42-1). The Nelchina harvest quota was 4,000 caribou (2,000 cows and 2,000 bulls) for the fall 2016 season. In an effort to maximize harvest, all draw hunts were combined into a unit-wide draw (DC485). The fall season was extended by emergency order from September 20 to September 30 for all state hunts and the harvest quota was removed for the winter season, which remains open until March 31. As of January 4, 2017, 2,022 cows and 2,828 bulls have been reported in the state harvest and 157 cows and 265 bulls have been reported in the federal harvest, for a total Nelchina harvest so far of 5,277 animals in the 2016–2017 season. This is the highest harvest since 1996, when 48,722 state permits were issued.

Table 42-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2016.

Year	RC566		CC001		DC480-483 or 485		Harvest Quota	Total State Permits	Reported Harvest ^a
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	479	127	-	-	1,000	979	797
2010 ^b	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	323	87	1,127	319	2,400	4,598	2,515
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2013 ^c	6,880	1,573	689	114	5,000	609	2,500	12,567	2,645
2014	5,595	2,268	569	144	1,000	299	3,000	7,164	2,993
2015	7,232	2,909	659	191	1,001	296	3,000	8,895	4,134
2016	8,470	2,934 ^d	1,006	290 ^d	5,000	1,631 ^d	-	14,476	5,277 ^d

^a Reported harvest includes caribou taken under state and federal hunts.

^b The CSH caribou hunt was not offered during regulatory year 2010, but 3,604 permits were issued for a winter hunt (TC566).

^c State hunts were closed by Emergency Order on October 15th.

^d Harvest is ongoing.

During most regulatory years, less than 25% of the Nelchina caribou harvest reported on state permits occurs after September 30 (Table 42-2). In years such as RY2016, when harvest is essential and the herd has remained relatively accessible throughout the season, harvest through draw permits after September 30 can be a significant addition to the overall harvest. This year, between October 20, 2016 and January 16, 2017, DC485 hunters have harvested more caribou than RC566 or CC001 hunters (Table 42-2).

Table 42-2. Nelchina caribou harvest on state permits (RC566, CC001, DC480–485)

Regulatory Year	State Harvest	Harvest after September 30 th			Percent of state harvest taken after September 30th
		RC566	CC001	DC480–485	
2009	404	56	46	0	25%
2011	2,032	144	15	59	11%
2012	3,715	485	53	389	25%
2013	2,296	0	0	0	0%
2014	2,711	284	31	50	13%
2015	3396	111	4	32	4%
2016 ^a	4893	371	41	429	17%

^a Harvest is ongoing; totals as of 1/16/2017

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of hunting opportunity, but recommends that the board consider the effect this proposal might have on harvest during years when herd migration out of the hunt area is delayed and increased harvest is necessary to regulate population size.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

PROPOSAL 43 – 5 AAC 85.045. Hunting seasons and bag limits for moose.

PROPOSED BY: Aaron Bloomquist and Rebecca Schwanke

WHAT WOULD THE PROPOSAL DO? This proposal would eliminate the CSH for moose, lengthen the harvest ticket season by twelve days, and adopt a late season “any-bull” registration hunt.

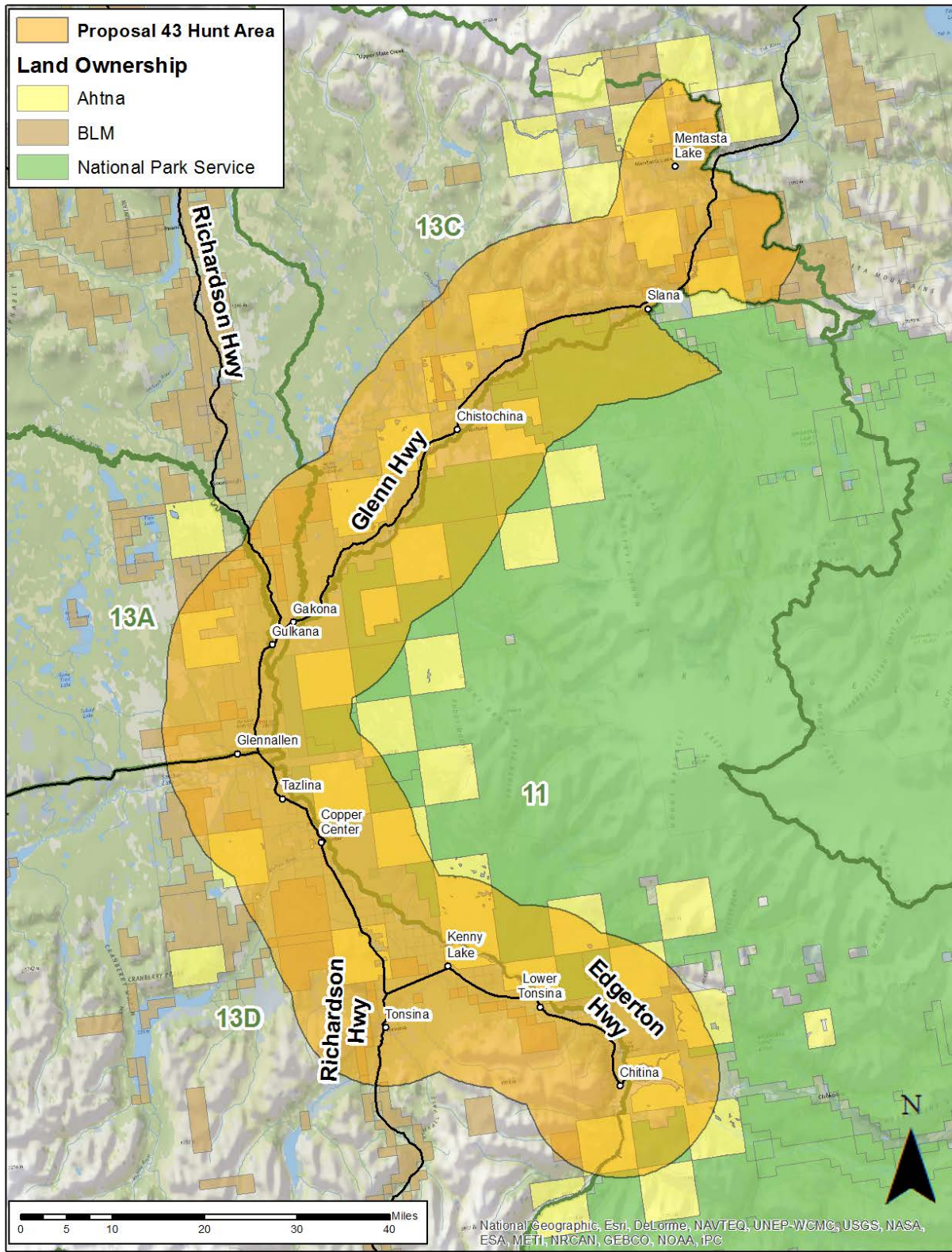
WHAT ARE THE CURRENT REGULATIONS?

- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300). The board has established an allocation of 100 any-bull moose (bull moose that do not meet antler restrictions for the fall CSH season). Once the 100 “any-bull” allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side (three or more brow tines in Unit 11). Each CSH group has a bag limit of one “any-bull” for every three households.
- Resident hunters with harvest tickets may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters may also apply for a drawing permit hunt for one antlerless moose (no take of calves or cows accompanied by a calf; DM325). Open season for DM325 is October 1– 31 and March 1–31, and up to 200 permits may be issued. 10 permits were issued in 2016
- Resident hunters may also apply for a drawing permit for one bull (DM 324), with an open season of September 1–20. Up to five permits may be issued, and all 5 permits were issued in 2016.
- A winter registration hunt (RM319) and a winter CSH hunt (CM301) to take one bull from December 1–31 were also authorized by the Board of Game, but have not been implemented by the department since 2014 due to concerns about high levels of participation and our ability to manage the hunt within biologically sustainable limits.
- Nonresidents with a drawing permit (DM 335–DM339) are allowed to hunt for one bull with 50-inch antlers or antlers with 4 or more brow tines. Up to 150 permits may be issued, and 115 permits were issued in 2016.
- Federal subsistence regulations provide additional opportunity for residents of Units 12, 13, 20A, and 20D. Alaska residents who qualify to hunt under federal regulations can obtain a permit to harvest one antlered bull per household in Unit 13E or one antlered bull per person in the remainder of Unit 13. The federal season is August 1–September 20.

There is a positive C&T use finding for moose in Unit 13 with an ANS of 300-600.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? The board may not be providing a reasonable opportunity for the communal pattern of use that was adopted into regulation, and moose hunting opportunities would only be provided for the individual pattern of use through subunit-based registration hunts without antler restrictions. A new registration permit area would be established (Figure 43-1). Without antler restrictions, the new registration hunts would be eligible for proxy hunting. The harvest ticket moose season (GM000) in Unit 13 would open on August 20, extending the season by 12 days.

Figure 43-1 Proposed registration moose hunt area in Units 11&13 from Proposal 43.



BACKGROUND:

In 2006-170-BOG and 2011-184-BOG, the board recognized there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose and caribou hunts to provide a reasonable opportunity for the community-based pattern in addition to other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the harvest ticket moose hunt (with antler restrictions) and the winter registration “any-bull” moose hunt.

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Since the hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 43-1). In 2009 there was one CSH moose group with 378 participants; this increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants.

Table 43-1. Participation and harvest in the CSH hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

CSH hunters have harvested an average of 137 moose annually, including an average of 81 bulls that do not meet harvest ticket antler restrictions (“any-bull”) since 2009 (Table 43-2). Hunters harvested an average of 898 moose annually during the same period (Table 43-3). Much of the CSH harvest occurs during the first ten days of the season concurrent with the any-bull hunting opportunity. Residents of Unit 13 harvested 13 (11.7%) of those “any-bull”, while residents of other Alaskan communities harvested 98 (88.3%) of those “any-bull” (Table 43-4).

Table 43-2. CSH moose harvest by unit, 2016.

	“any-bull” Quota	“any-bull” Harvest	“any-bull” Closure	Antler Legal Harvest	Total Harvest
13A WEST	0	1		32	33
13A EAST	10	8		2	10
13B	30	31	EO Sept 2	24	55
13C	18	20		4	24
13D	14	15	EO Sept 2	6	21
13E	26	38	EO Aug 24	19	57
11Z	2	1		0	1
	100	114		87	201

Table 43-3. Unit 13 moose harvest by hunt, RY2009, 2011–2016.

Regulatory Year	CM300 Harvest	GM000 Harvest	FM1301 Harvest	Draw Permit Harvest	Total Harvest
2009	98	631	61	76	866
2011	83	724	80	65	952
2012	97	518	59	46	720
2013	156	450	50	67	723
2014	149	675	86	27	937
2015	170	765	85	30	1,050
2016 ^a	198	709	100	30	1,037

^a Harvest data is not finalized.

Table 43-4. CSH any-bull moose harvests by hunter residency, 2009–2016.

Year	Residency of hunter				Total any-bull harvest
	Unit 13		Other Alaska		
	Number of any- bulls harvested	Percent of any- bull harvest	Number of any- bulls harvested	Percent of any- bull harvest	
2009	66	97.1%	2	2.9%	68
2010	<i>The community hunt was not offered in regulatory year 2010</i>				
2011	39	66.1%	20	33.9%	59
2012	23	31.5%	50	68.5%	73
2013	11	13.6%	70	86.4%	81
2014	16	20.8%	61	79.2%	77
2015	23	25.0%	69	75.0%	92
2016 ^a	14	14%	100	87.7%	114

^a Harvest data is not finalized.

Table updated 3/7/2017.

Bull-to-cow ratios are close to management objectives near easily accessible areas (Table 43-5). Current harvests have been increasing in recent years; however, harvest does not appear to be having an adverse effect on bull:cow ratios. One exception may be in 13A where the bull ratio observed was 20 bulls:100 cows in 2016; however, it is expected to improve with changes in hunt management and administration.

Table 43-5. Unit 13 moose population objectives and 2015 estimates.

	Unit 13A	Unit 13B	Unit 13C	Unit 13E
Population Objective	3,500–4,200	5,300–6,300	2,000–3,000	5,000–6,000
2015 population abundance estimate	3,570	5,050	2,185	5,085
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose harvest in the Copper Basin Subsistence hunt area. If adopted, the board should consider whether reasonable opportunity for success in harvesting a moose for the communal pattern of use still exists, as well as overall reasonable opportunity for subsistence uses of moose in Units 11, 12, and 13. If adopted, the department would have to modify the current hunt structure but anticipates difficulty implementing the proposed hunt structure. Issuing high-demand permits on a first-come, first-serve basis continues to be problematic for the department and for the public, whether they are offered online or in-person. Additionally, the availability of bull moose in easily accessible areas may be reduced in the future.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.

The following proposal was submitted by the proposal deadline but was not included because the nature of the proposed changes appeared to be statewide. It is being distributed to the board and the public for consideration at the March 2017 meeting to apply only to the Copper Basin Community Subsistence Harvest Hunt in Units 11, 12, and 13.

PROPOSAL 44 – 5 AAC 92.072. Community subsistence hunt area and permit conditions.

Modify the community subsistence harvest hunt permit conditions for the Copper Basin Community Subsistence Hunt.

PROPOSED BY: Ahtna Tene Nené

WHAT WOULD THE PROPOSAL DO? This proposal amends the department’s authority under 5AAC 92.072 to issue community-based subsistence harvest permits and reports in 5AAC 92.074(d) as follows:

- 1) clarify that the Copper Basin community subsistence hunt (CSH) is intended for communities that are engaged in the community-based pattern of subsistence hunting rather than any group of 25 residents without any link to other members besides the desire to take advantage of increased harvest opportunity through participation in the CSH regulations;
- 2) require each community that wishes to establish a CSH to make a proposal to the board that includes that community's subsistence hunting area in the units that they hunt, and a pattern of community-based subsistence use of that area;
- 3) require the board to determine that a community is eligible to participate in the Copper Basin CSH before the department can issue a CSH permit to that community;
- 4) amend reporting requirements to allow waivers for communities that demonstrate a long-term, consistent pattern of use in the Copper Basin CSH for communities that have successfully completed five years of reporting;
- 5) eliminate the restriction of only issuing one locking tag to harvest an "any-bull" moose for every three households in a Copper Basin CSH community; and
- 6) require each community to demonstrate a quota or other allocation that is the amount necessary for subsistence (ANS) uses for the community and a season or other methods, means etc. that is necessary to provide a reasonable opportunity for the community's subsistence uses; and
- 7) adds a stipulation that participants may only change groups every three years.

WHAT ARE THE CURRENT REGULATIONS?

Caribou

- There is a positive C&T use finding for the Nelchina caribou herd in Unit 13 with an ANS of 600–1,000 caribou.
- Tier I registration permits (RC566) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20* and October 21–March 31 with a bag limit of one caribou per household. There is no cap on the number of Tier I caribou registration permits that may be issued annually.
- Tier I Community Subsistence Harvest permits and reports (CC001) are issued to all residents who successfully apply for the hunt. The season is August 10–September 20* and October 21–March 31 with a bag limit of one caribou per household. There is no cap on the number of Tier I CSH permits that may be issued annually.
- One drawing permit hunt for caribou in Unit 13 (DC485) is available for resident hunters. Up to 5,000 permits may be issued annually to resident hunters. The season is August 20–September 20* and October 21–March 31 with a bag limit of one caribou.
- There is currently no nonresident hunting season for Nelchina caribou in Unit 13.

- Federal subsistence regulations provide additional opportunities for residents of Units 11, 12, 13, 20A, and 20D. Alaska residents who qualify to hunt under federal regulations can obtain a permit (FC1302) to harvest two caribou in Units 13A and 13B and two bulls in Units 13C, 13D, and 13E—a total bag limit of two caribou per hunter. The federal seasons are August 1–September 30 and October 21–March 31 throughout Unit 13.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will be bound by the conditions of the hunt.

**Note: The fall Nelchina caribou hunting season was extended by Emergency Order until September 30 for all state hunts in 2016.*

- Up to 300 caribou can be taken by all CSH caribou groups combined.

CSH caribou hunt participants (recipients of CC001, and all household members) must apply as part of a community or group of at least 25 individuals and must make a two-year commitment. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.

In addition to regulations, the board has approved the following CSH hunt conditions under the department’s discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board’s finding at 2006-170-BOG, namely:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration caribou hunts, or hold caribou harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- After the CSH hunt has ended, if the household was unsuccessful in filling the CSH bag limit during the CSH hunt, household members may hunt in areas outside the CSH hunt area with caribou harvest tickets or other state caribou permits where the bag limit is greater than one caribou per household.
- No member of the household may hunt moose outside of the CSH hunt area.
- Any member of the household may harvest the caribou, and any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the heart, liver, kidneys, and fat, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Prior to October 1, meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

- The one caribou bag limit may be changed by Emergency Order to one bull or one cow, or the hunt may be closed by Emergency Order.

Moose

- The Board of Game has made a positive C&T finding for moose in Unit 11 and found that 30–40 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T finding for moose in Unit 12, and found that 60–70 moose are reasonably necessary for subsistence in that unit. The board has also made a positive C&T finding for moose in Unit 13, with an ANS of 300–600 moose.
- Resident hunters with CSH harvest reports may harvest one bull from August 20–September 20 (CM300, Unit 11) and December 1–31 (CM301). The board has established an allocation of 100 “any-bull” moose (bull moose that do not meet harvest ticket antler restrictions) for the fall CSH season. Once the 100 “any-bull” allocation has been met, the bag limit is changed by emergency order to one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side (three or more brow tines in Unit 11). Each CSH group has a bag limit of one “any-bull” for every three households.
- Resident hunters with harvest tickets may harvest one bull with spike-fork antlers or 50-inch antlers or antlers with four or more brow tines on one side from September 1–20.
- Resident hunters may also apply for a drawing permit hunt for one antlerless moose (no take of calves or cows accompanied by a calf; DM325). Open season for DM325 is October 1–31 and March 1–31, and up to 200 permits may be issued. Ten permits were issued in 2016.
- Resident hunters may also apply for a drawing permit for one bull (DM324), with an open season of September 1–20. Up to five permits may be issued, and all five permits were issued in 2016.
- A winter registration hunt (RM319) and a winter CSH hunt (CM301) to take one bull from December 1–31 were also authorized by the Board of Game, but have not been implemented by the department since 2014 due to concerns about high levels of participation and our ability to manage the hunt within biologically sustainable limits.
- Nonresidents with a drawing permit (DM335–DM339) are allowed to hunt for one bull with 50-inch antlers or antlers with four or more brow tines. Up to 150 permits may be issued, and 115 permits were issued in 2016.
- Federal subsistence regulations provide additional opportunity for residents of Units 12, 13, 20A, and 20D. Alaska residents who qualify to hunt under federal regulations can obtain a permit (FM1301) to harvest one antlered bull per household in Unit 13E or one antlered bull per person in the remainder of Unit 13. The federal season is August 1–September 20.
- The group coordinator must submit an annual Coordinator Community Harvest Report on a form provided by the department. If the coordinator fails to do so, all group participants will be placed on the Failure to Report list and will not be eligible to participate in the CSH hunt during the following regulatory year, but will be bound by the conditions of the hunt. CSH moose hunt participants (recipients of CM300, and all household members) must apply as part of a community or group of at least 25 individuals and must make a two-year commitment. Applicants who do not provide required information are removed from the application pool. A hunting license is not required to qualify as a group member.

In addition to regulations, the board has approved the following CSH hunt conditions under the department's discretionary permit authority in order to ensure that participants are following, or attempting to follow, the customary and traditional use pattern that the board intended for people to follow when the hunt was created, and that is spelled out in the board's finding at 2006-170-BOG, namely:

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration moose permits, or hold moose harvest tickets.
- No member of the household may apply for state or federal moose or caribou permit hunts outside of the Copper Basin Community Hunt area (Units 11, 13, and that portion of Unit 12 south of the Little Tok River).
- Each group will be issued one any-bull locking-tag for every three households. Hunters must have a locking-tag in their possession to harvest an "any-bull" moose, and are required to affix the locking-tag to the main-beam of one antler immediately upon harvest of a moose that does not conform to the Unit 13 harvest ticket antler restrictions. Hunters that do not have a locking tag in their possession must harvest only bulls that conform to the Unit 13 harvest ticket antler restrictions.
- Any member of a given CSH group may hunt on behalf of another member as a designated hunter.
- Hunters must salvage the head, heart, liver, kidneys, stomach, and hide, as well as all edible meat from the front quarters, hindquarters, ribs, neck, and backbone.
- Meat of the front quarters, hindquarters, and ribs must remain naturally attached to the bone until delivered to the place where it is processed for human consumption.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED? An eligible community would be defined by having at least 25 members who have been "engaged in the community-based pattern of subsistence hunting".

Before any permits are issued, the board would be required to approve a community's eligibility to participate in the program through proposals submitted by each community detailing their community's subsistence harvest and patterns of community-based use of that area. Through this process communities would have to define and justify an individual ANS for their community, a season, and other methods and means by species that are necessary to provide a reasonable opportunity to meet their subsistence needs. For moose, restriction on the number of "any-bull" locking tags issued would be eliminated, which would allow all participants to harvest an "any-bull" moose.

In addition, the department would have the authority to waive the household and/or group reporting requirements for communities that have demonstrated a consistent pattern of use and timely reporting for at least five consecutive years.

BACKGROUND:

In 2006-170-BOG and 2011-184-BOG, the board recognized there are two basic use patterns within a range of subsistence uses for moose and caribou in Unit 13: 1) a pattern for individuals, families, and

other social groups (both within and outside the local area; 2011-184-BOG); and 2) “the community-based pattern established by the Ahtna” (2006-170-BOG). The board recognized that the community-based pattern has been “adopted and modified by other local settlers and, to a more limited degree, by other Alaska residents.”

To address these patterns of use the BOG created the CSH moose and caribou hunts to provide a reasonable opportunity for the community-based pattern in addition to other regulatory options to provide reasonable opportunities by individual hunters and families who chose not to organize as a community. Other options include the general harvest ticket moose hunt (with antler restrictions), winter registration “any-bull” moose hunt, Tier I caribou hunt, and a caribou draw hunt.

Moose

The board developed the current hunt structure for resident moose hunting opportunity in Unit 13 with an earlier starting date for the CSH hunt. Board finding 2015-209-BOG recommends that the department establish individual quotas for each subarea of the Copper Basin community subsistence hunt for the moose that do not meet harvest ticket antler requirements in Units 11 and 13 and that the department should attempt to achieve the quota for each subarea regardless of whether or not the total harvest exceeds the total allocation for the CSH program.

Since the CSH hunt was established, the number of resident hunters participating in the CSH hunt has increased (Table 44-1). In 2009 there was one CSH moose group with 378 participants which increased to 45 groups with 2,066 participants by 2013. Currently there are 73 groups with 3,400 participants. It is important to note that not each permit or harvest ticket/report equates to a hunter in the field or hunter success.

Table 44-1. Participation and harvest of moose in the CSH moose hunt in Units 11, 13 and a portion of Unit 12, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Communities Participating	Number of Households	Number of Individual Participants	Total Number of Moose Harvested ^c
2009	1	19	246	378	100 (68 “any-bull”)
2010 ^a	-	-	-	-	-
2011	9	31	416	814	86 (59 “any-bull”) ^b
2012	19	29	460	969	98 (73 “any-bull”) ^b
2013	45	41	955	2,066	156 (81 “any-bull”) ^b
2014	43	41	893	1,771	150 (77 “any-bull”) ^b
2015	43	43	1,039	1,984	171 (92 “any-bull”) ^b
2016	73	48	1,527	3,400	201 (114 “any-bull”) ^b

^aThe community hunt was not offered in regulatory year 2010.

^bEmergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

^c Additional “any-bulls” are harvested in the area under federal permits.

Prior to the establishment of the CSH, opportunity to harvest an “any-bull” moose in the subsistence hunt in Unit 13 was allocated through a subsistence drawing hunt (1983–1985), a subsistence registration hunt open only to local residents (1986–1989), and a Tier II hunt (1995–2008). The current distribution of moose harvests, including the “any-bull” cohort, across the CSH area is detailed in Table 44-2. Over the last eight years resident CSH hunters of Unit 13 have taken an average of 28 “any-bulls” annually or 38% of the total harvest (Table 44-3). Other Alaskan CSH hunters have harvested an annual average of 54 moose (62%).

Table 44-2. Moose CSH “any-bull” quota distribution, harvest, and dates of Emergency Orders to restrict the CSH bag limit if the quota was exceeded, regulatory year 2016.

	“any-bull” Quota	“any-bull” Harvest	“any-bull” Closure	Antler Legal Harvest	Total Harvest
13A WEST	0	1		32	33
13A EAST	10	8		2	10
13B	30	31	EO Sept 2	24	55
13C	18	20		4	24
13D	14	15	EO Sept 2	6	21
13E	26	38	EO Aug 24	19	57
11Z	2	1		0	1
	100	114		87	201

Table 44.3. CSH “any-bull” moose harvest, by community of residence, regulatory years 2009 through 2016.

Year	Residency of hunter				Total any-bull harvest
	Unit 13		Other Alaska		
	Number of any- bulls harvested	Percent of any- bull harvest	Number of any- bulls harvested	Percent of any- bull harvest	
2009	66	97.1%	2	2.9%	68
2010	<i>The community hunt was not offered in regulatory year 2010</i>				
2011	39	66.1%	20	33.9%	59
2012	23	31.5%	50	68.5%	73
2013	11	13.6%	70	86.4%	81
2014	16	20.8%	61	79.2%	77
2015	23	25.0%	69	75.0%	92
2016 ^a	14	14%	100	87.7%	114

^a Harvest data is not finalized.

Table updated 3/7/2017.

Caribou

In March 2009 the board established the current ANS of 600–1,000 caribou for the Nelchina caribou herd (NCH). When the Nelchina harvest quota is above 1,000 caribou, hunting opportunity is administered under a “Tier I Plus” hunt structure. The “Tier I Plus” hunt structure is composed of resident-only hunts, which includes Tier I hunts (Copper Basin CSH hunt CC001, and Tier I registration hunt RC566) and drawing permit hunts. The board has not established a harvest quota threshold that would allow nonresident hunting opportunity when the threshold is exceeded.

The NCH has increased in population size since 2009, and the combined harvest has not reached the established harvest quotas in recent years, despite increases in participation. The department currently issues the maximum number of permits for the drawing hunt annually (5,000 drawing permits). Participation in the CSH hunt has also increased (Table 44-4); however the hunt is still limited to a maximum of 300 caribou, which is typically not reached (with the exception of regulatory year 2016).

Table 44-4. Nelchina caribou CSH participants, Units 11 and 13, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Towns Represented	Number of Households	Number of Individual Participants
2009	1	19	477	-
2010 ^a	-	-	-	-
2011	6	31	322	636
2012	17	29	402	824
2013	28	41	687	1,424
2014	25	38	569	1,121
2015	26	44	659	1,359
2016	45	49	1,011	2,272

^aThe community hunt was not offered in regulatory year 2010.

An average of 2,637 Nelchina caribou have been harvested annually by resident hunters since 2009. Nonresident hunting opportunity has not been offered since 1981. The number of CSH caribou hunting harvest tickets/reports issued annually has increased from 477 in 2009 to 1,011 in 2016 (Table 44-5). Similarly, the number of Tier I registration permits (RC566) issued annually also increased from 500 in 2009 to 8,470 in 2016, and the department increased the number of drawing permits issued annually to 5,000 permits in an attempt to reach the harvest quota and keep the caribou population within management objectives (Table 44-6).

Table 44-5. Nelchina caribou harvest permits and harvest tickets/reports for Unit 13, regulatory years 2011 through 2016.

Year	RC566	CC001	DC480-483 ²	FC1302 ³	Total
2009	500	479	-	2,576	3,555
2010 ¹	1,151	-	-	2,853	4,004
2011	3,148	323	1,127	2,980	7,578
2012	5,045	403	3,001	2,953	11,402
2013	6,880	689	5,000	2,782	15,351
2014	5,595	569	1,000	2,943	10,108
2015	7,235	659	1,001	3,064	11,958
2016	8,470	1,006	5,000	2,873	17,349

¹The CSH caribou hunt was not offered during regulatory year 2010.

²DC480-483 were combined in RY2016 (DC485).

³FC1302 is a federal permit hunt

Table 44-6. Nelchina caribou hunters and harvest summary, Unit 13, regulatory years 2011 through 2016.

Year	RC566		CC001		DC480-483 ³		FC1302		Harvest Quota	Total Reported Harvest
	Hunters	Harvest	Hunters	Harvest	Hunters	Harvest	Hunters	Harvest		
2009	414	277	288	127	-	-	1,339	349	1,000	797
2010 ¹	936	615	-	-	-	-	1,536	452	2,300	2,439 ²
2011	2,393	1,626	174	87	677	319	1,425	395	2,400	2,515
2012	3,880	2,542	238	150	2,079	1,023	1,538	536	5,500	4,430
2013	4,148	1,573	308	114	2,188	609	1,308	277	2,500	2,645
2014	3,874	2,267	266	144	573	299	1,399	237	3,000	2,993
2015	4,644	2,897	324	191	558	296	1,562	594	4,300	4,134
2016 ⁴	-	2,249	-	197	-	1,015	-	69	--	3,530

¹The CSH caribou hunt was not offered during regulatory year 2010.

²Reported harvest includes caribou taken by hunters with TC566 permits.

³DC480-483 were combined in RY2016 (DC485).

⁴Harvest as of September 28, 2016.

DEPARTMENT COMMENTS: The department is **NEUTRAL** on the allocation of moose and caribou hunting in the Copper Basin community subsistence harvest hunts.

COST ANALYSIS: Adoption of this proposal is not expected to result in additional costs to the department.
