

PROPOSAL 154 – 5 AAC 85.025. 5 AAC 85.045(9)-(11). Hunting seasons and bag limits for moose; 85.025(8). Hunting seasons and bag limits for caribou; 92.072. Community subsistence harvest hunt area and permit conditions; 92.050. Required permit hunt conditions and procedures; and 92.052. Discretionary permit hunt conditions and procedures.

PROPOSED BY: Ahtna Tene Nené

WHAT WOULD THE PROPOSAL DO? This proposal requests a review of hunting opportunity for the moose and caribou provided by the Copper Basin community subsistence harvest (CSH) hunts in Units 11, 12, and 13. The following changes have been proposed and may be considered by the board:

- Increase the “any bull” moose quota in closed subunits and extend the CSH season for all moose through at least September 25.
- Increase the CSH quota of caribou and the household bag limit from 1 to 2 and extend the season to at least September 25.
- Revise the current CSH regulations to conform to the intent of the Board of Game when it first adopted the CSH and take additional steps to address the proponent’s concerns.

WHAT ARE THE CURRENT REGULATIONS?

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 (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 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 1 caribou.
- There is currently no nonresident hunting season for Nelchina caribou in Unit 13.
- Federal subsistence regulations provide additional opportunity for residents of Units 11, 12, 13, 20A, and 20D. Alaska residents who qualify to hunt under federal regulations can

obtain a permit to harvest 2 caribou in Units 13A and 13B and 2 bulls in Units 13C, 13D, and 13E, a total bag limit of 2 caribou per hunter. The federal seasons are August 1–September 30 and October 21–March 31 throughout Unit 13.

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

Moose

- Resident hunters with CSH harvest reports may harvest 1 bull from August 20–September 20 (CM300). The board has established an allocation of 100 any-bull moose (bull moose that do not meet general season 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 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side (3 or more brow tines in Unit 11). Each CSH group has a bag limit of 1 “any bull” for every 3 households.
- Resident hunters with general season harvest tickets may harvest 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 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 5 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 1 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 1 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? If this proposal is adopted, the CSH quotas for caribou and moose would be increased, and the CSH season would be extended to at least September 25 for both species. The third recommendation reflects the position of the proponent that the board established the CSH with intent to provide the eight Ahtna communities with a reasonable opportunity to take up to 100 any bull moose in conformance with the C&T uses of these communities, and that the unanticipated large increase in participation in the CSH, primarily by non-local communities, has diminished the reasonable opportunity of Ahtna communities to achieve their harvest goals and meet their subsistence needs.

BACKGROUND:

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

The board then created the CSH moose and caribou hunts 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.

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.

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 1); however the hunt is still limited to a maximum of 300 caribou, which has not been reached in any year since this cap was established.

An average of 2,900 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). Similarly, the number of Tier I registration permits 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. It should be noted that not every permit or harvest ticket/report equates to a hunter in the field, or hunter success (Table 3).

The estimated population size for the Nelchina caribou herd was 40,500 caribou in 2013. Composition surveys conducted during October 2014 observed ratios of 42 bulls:100 cows and 45 calves:100 cows. The Nelchina harvest quota was 3,000 caribou (1,300 cows and 1,700 bulls) in 2014. As of September 28, 2016, 1,543 cows and 1,917 bulls had been reported in the harvest from a quota of 4,000 caribou.

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). Most general hunting opportunity was allocated through a drawing hunt (1986–1989).

Table 1. 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 ¹	-	-	-	-
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

¹ The community hunt was not offered in regulatory year 2010.

Table 2. 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	477	-	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	5,596	569	1,000	2,943	10,108
2015	7,235	659	1,000	3,064	11,958
2016	8,470	1,011	5,000	2,873	17,349

¹ The CSH caribou hunt was not offered during regulatory year 2010.

² DC480-483 were combined in RY2016 (DC485).

³ FC1302 is a federal permit hunt

Table 3. 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

¹ The CSH caribou hunt was not offered during regulatory year 2010.

² Reported harvest includes caribou taken by hunters with TC566 permits.

³ DC480-483 were combined in RY2016 (DC485).

⁴ Harvest as of September 28, 2016.

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 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 general season antler requirements in Units 11 and 13 and 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. Similar to caribou, it is important to note that not each permit or harvest ticket/report equates to a hunter in the field or hunter success (Table 4 and Table 5).

Since 2009 CSH hunters have harvested an average of 136 moose annually, including an average of 82 bulls that do not meet general season antler restriction (“any bull”). General season hunters harvested an average of 622 moose annually from 2009 to 2015 (excluding 2010; (Table 5). Table 6 shows the distribution of moose harvests across the CSH area. Prior to the establishment of the CSH in 2009, 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). Table 7 shows the distribution of the “any bull” harvest in the CSH hunt according to hunter residency.

Much of the CSH harvest occurs during the first ten days of the season, when the “any bull” hunting opportunity is available (Figure 1).

Bull:cow ratios are close to management objectives near accessible areas. Current harvests have been increasing in recent years, though harvest does not appear to be having an adverse effect on bull:cow ratios (Table 8), partially due to the remoteness and lack of access to some areas.

Table 4. Moose CSH participants and harvest, regulatory years 2009 through 2016.

Regulatory Year	Number of Groups	Number of Households	Number of Individual Participants	Number of Hunters	Total Number of Moose Harvested
2009	1	246	378	293	100 (70 any bulls)
2010 ¹	-	-	-	-	-
2011	9	416	814	311	91 (64 any bulls) ²
2012	19	460	969	358	101 (76 any bulls) ²
2013	45	955	2,066	842	162 (88 any bull) ²
2014	43	893	1,771	599	150 (76 any bull) ²
2015	43	1,039	1,984	593	162 (92 any bull) ²
2016	73	1,527	3,410	-	189 (111 any bull) ²

¹ The community hunt was not offered in regulatory year 2010

² Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

Table 5. Moose harvest in Unit 13 by hunt type, regulatory years 2009 through 2015

Regulatory Year	CM300 Harvest	GM000 Harvest	FM1301 Harvest	Total Harvest
2009	100	627	61	788
2011	91	724	80	895
2012	101	508	59	668
2013	162	443	50	655
2014	150	666	86	902
2015	167	764	85	1016

Table 6. Moose CSH “any bull” quota distribution, harvest, and date an emergency order was issued to restrict the CSH bag limit if the quota was exceeded, 2016.

Game Management Unit	“Any Bull” Quota	“Any Bull” Harvest	Other Moose Harvest	Total Harvest	Emergency Order Date
Unit 11	2	1	0	1	-
Unit 12	0	0	0	0	-
Unit 13A West	0	1	30	31	-
Unit 13A East	10	8	2	10	-
Unit 13B	30	31	20	51	September 2
Unit 13C	18	20	4	24	-
Unit 13D	14	15	6	21	September 2
Unit 13E	26	37	17	54	August 24
Total	100	113	79	192	-

Table 7. Moose, CSH “any bull” harvest, by community of residence, regulatory years 2009 through 2016.

Regulatory Year	Residency of hunter				Total “any bull” harvest
	GMU 13 Hunters		Other Alaskan Hunters		
	Number of “any bulls” harvested	Percent of “any bull” harvest	Number of “any bulls” harvested	Percent of “any bull” harvest	
2009	68	97.1%	2	2.9%	70
2010 ¹	-	-	-	-	-
2011	42	65.6%	22	34.4%	64
2012	26	34.2%	50	65.8%	76
2013	12	13.6%	76	86.4%	88
2014	15	19.7%	61	80.3%	76
2015	23	25.0%	69	75.0%	92
2016	13	11.7%	98	88.3%	111

¹The community hunt was not offered in regulatory year 2010

Table 8. Moose, Unit 13 moose population objectives and 2015 survey 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	1,980	5,070
Bull:cow Objective	25:100	25:100	25:100	25:100
2015 estimate	25	37	30	25

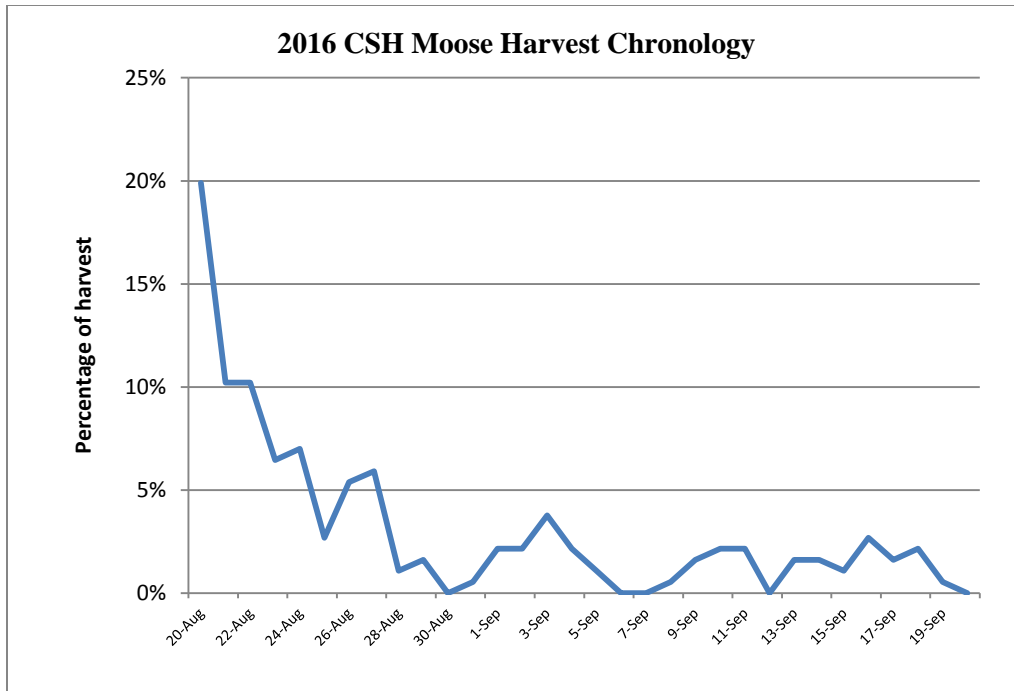


Figure 1. Chronology of CSH moose harvest during the fall moose hunting seasons in Unit 13 during regulatory year 2016.

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

If the board chooses to liberalize hunting opportunity for the Nelchina caribou herd, the department recommends structuring a bag limit increase in regulation based on population thresholds. As an example, if the population exceeds the upper limit of the population objective (40,000 caribou), a season extension and/or liberalized bag limit would be applied; however, if the population is below the upper limit of the population objective, the season extension and bag limit increase would be removed. This will allow seasons and bag limits to be adjusted to recommended levels without requiring further board action.

The department is **OPPOSED** to extending the moose season past September 20 due to the potential high harvest of animals during the rut and how that would affect bull:cow ratios in accessible areas. If the board chooses to increase the “any bull” moose quota for the CSH hunt, the department requests that the board allows the department to retain its discretion to allocate and reduce moose quotas due to biological concerns.

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