

*Note: The following proposal is from the August 30, 2016 letter submitted by Ahtna Tene Nene', rearranged into proposal format.*

**PROPOSAL 154 - 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.**

Address restricted hunting opportunity and inability to meet vital subsistence needs due to the extraordinary increases in participation in the moose and caribou community subsistence hunts for the Copper Basin, Units 11, 12, and 13 as follows:

- Increase the community subsistence harvest hunt (CSH) any bull 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 eliminate the abuse that has occurred since that time.

Ahtna requests this relief on behalf of those communities and households participating in the Ahtna group. Ahtna believes that the Board of Game has the authority to limit any action it takes in response to this request for a special meeting to the Ahtna group.

**What is the issue you would like the board to address and why?** Ahtna Tene Nene' hereby requests that the Board of Game (board) and Department of Fish and Game (ADF&G) Commissioner exercise their authority under AS 16.05.310 and hold a special meeting as soon as possible to address the lack of opportunity to meet subsistence needs related to a 70 percent increase in the number of groups enrolled in the 2016 Copper Basin Community Subsistence Hunt for moose and a corresponding increase in the groups and individuals participating in the CSH for Nelchina caribou. Ahtna hereby incorporates by reference its first request for a special meeting and the documents supporting the request.

Tables available through ADF&G demonstrate that only six days after the opening of the CSH for moose, the subunit 13E quota of 26 any bulls was fully taken and the subunit was accordingly closed on August 26. As of August 29, only four any bulls remained in both the 30 any bull quota for 13B and the 14 any bull quota for 13D. Both of these subunits are expected to close within days. These three subunits account for 70 of the 100 bulls without antler restrictions allocated to the CSH. The remaining allocation in 13A east, 13C and Units 11, 27 moose as of August 29, are harder to access and provide less meaningful subsistence opportunity. Immediate action is required to address this situation and provide greater subsistence opportunity.

In 2015, 43 groups enrolled in the CSH. Seventy-three groups are enrolled for the 2016 CSH. The number of households similarly increased from 1,039 in 2015 to 1,542 in 2016, an increase

of 67%. The CSH for moose now includes 3,357 individuals. Despite the increase in participating groups, households, and individuals, the 100 any bull allocation remains the same as when the CSH was established in 2009.

The record in establishing the 100 any bull allocation demonstrates that the board determined this allocation was necessary to provide a reasonable opportunity to meet the subsistence needs of the eight Ahtna communities that established the CSH. The first year of the community hunt, these eight communities and the 427 individuals who participated in the CSH took 66 any bulls and 27 bulls that satisfied the antler requirements for the general hunt. This was the first time in decades that the Ahtna villages actually had enough to provide for their customary and traditional needs and uses. The moose harvest of these same communities and households over the past several years has fallen far short of this level of harvest, and the subsistence needs of the villages have gone unmet. In 2015, with far fewer groups and hunters participating in the CSH, Ahtna only harvested 14 any-bulls and 11 antler legal bulls. As best as Ahtna can determine, to date [August 30, 2016] members of the Ahtna community hunt have only taken three any bull moose in 2016.

The loss of subsistence opportunity will not be limited to the any bull allocation. The large increase in hunters means that there will be many more CSH hunters in the field throughout the season hunting for all available moose. The CSH success rate will drop even further than last year for any bulls and bulls with antler restrictions. The hardship and lack of subsistence hunting opportunity will likely continue through the season and throughout the year as communities go without this essential subsistence resource.

In addition to the lack of subsistence moose opportunity, there is also an increasing possibility that the CSH quota for caribou, 300, will be taken before the season ends on September 20. The number of caribou hunters in the CSH has also nearly doubled from 2015 to 2016. According to ADF&G, about 100 caribou have already been taken in Unit 13 under the CSH. This is a significantly greater harvest for this period of the season than in previous years. If this rate of harvest continues, the 300 CSH quota will be filled before September 20 and there will not be a spring season for the CSH. This would compound the failure to provide for a reasonable subsistence opportunity to meet the needs of the Ahtna communities.

Ahtna asked in its first request to the board on March 23, 2016, that a Tier II hunt be established for the 100 any bull opportunity in the CSH. Ahtna proposed that only those household enrolled in the moose CSH would be eligible to participate in the Tier II permitting process. The board refused to act, and the time has long past to grant this relief. At this point, Ahtna suggest the following:

- Increase the CSH any bull 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.

Ahtna requests this relief on behalf of those communities and households participating in the Ahtna group. Ahtna believes that the Board of Game has the authority to limit any action it takes in response to this request for a special meeting to the Ahtna group. Ahtna is the only group requesting

this relief, and the Ahtna communities are the only communities that have developed a record before the board demonstrating the need for the any bull allocation and an extended season in order to meet subsistence needs. This does not invoke any local or rural residency concerns since there are members of the Ahtna CSHs that are from urban areas and yet remain closely connected to the Ahtna villages' customary and traditional subsistence way of life.

Additionally, Ahtna requests that the board and Commissioner call for a second special meeting prior to the November 1 opening of the application period for groups to apply to for the 2017 CSH for caribou and moose. The call for a second special meeting should include sufficient public notice and opportunity for comment to allow the board to revise the current CSH regulations to conform to the intent of the Board of Game when it first adopted the CSH and eliminate the abuse that has occurred since that time.

**PROPOSED BY:** Ahtna Tene Nene'

(HQ-OCT-2016-001)

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