

**Alaska Department of Fish and Game**  
**Staff Comments for Proposal 94**  
**Central/Southwest Region Alaska Board of Game Meeting**  
**Dillingham, Alaska**  
**February 16-23, 2018**



**The following staff comments were prepared by the Alaska Department of Fish and Game for use at the Alaska Board of Game meeting, February 16-23, 2018 in Dillingham, 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.**

---

---

**PROPOSAL 94 – 5 AAC 92.072. Community subsistence harvest hunt area and permit conditions, and 85.025. Hunting seasons and bag limits for caribou.** Eliminate the community subsistence harvest hunt for caribou in Unit 13.

**PROPOSED BY:** Kenneth Manning

**WHAT WOULD THE PROPOSAL DO?** This proposal would eliminate the community subsistence harvest (CSH) for caribou (CC001). *Note: The board held a special meeting in March 2017 where they addressed 44 proposals to modify or eliminate the CSH moose and caribou hunts. The intended effect of this proposal was addressed by the board at the March 2017 meeting.*

**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.
- Tier I registration permits for Unit 13 are issued to all residents who successfully apply for the hunt. Applicants must choose between a season of August 10–August 31 and

October 21–March 31 (RC561) or September 1–September 20\* and October 21–March 31 (RC562) 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 in Unit 13 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.
- 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.
- The group coordinator must submit an annual Community Subsistence Hunt Coordinator 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 (FTR) 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.
- 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 to harvest two caribou in Units 13A and 13B or 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.
- Up to 400 caribou can be taken by all CSH caribou groups combined.

*\*Note: The fall Nelchina caribou hunting season was extended by Emergency Order until September 30 for all state hunts in 2016 and 2017; the bag limit for RC566 and CC001 for RY2016 was raised from one to two caribou by Emergency Regulation in March 2017.*

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 when the hunt was created, as specified in the board's finding 2006-170-BOG.

- No member of the household will be eligible to hold any state drawing/Tier I/Tier II/or registration caribou hunts, or hold general season 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 general 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.

**WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?** The community hunt for caribou in the Copper Basin Subsistence hunt area would not be available; 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 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 board created the CSH moose and caribou hunts to provide a reasonable opportunity for the community-based pattern in addition to existing regulatory options that provide reasonable opportunities by individual hunters and families who chose not to follow the community-based pattern established by the Ahtna.

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 is comprised of resident-only hunts, including Tier I hunts (i.e., Copper Basin CSH hunt CC001 and Tier I registration hunts RC561 and RC562) 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, as has participation in the Tier I hunt and the CSH hunt (Table 94-1). The department currently issues the maximum number of permits for the drawing hunt annually (5,000 drawing permits). 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 1,004 in 2017 (Table 94-2). Similarly, the number of Tier I registration permits issued annually also increased from 500 in 2009 to 8,444 in 2017. It should be noted that not every permit or harvest ticket/report equates to a hunter in the field or hunter success.

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. A population estimate was not established for 2017 but modeling suggested that the population size is comparable to the 2016 estimate. Composition surveys conducted during July 2017 observed ratios of 45 bulls:100 cows and 54 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).

In March of 2017, the board split the Tier I Nelchina Hunt (RC566) into two separate seasons in an effort to decrease hunter crowding; hunters must now choose the August season or the September season (RC561 or RC562), and both permits include the winter season. These seasons will be implemented for RY2018.

Table 94-1. Unit 13 state Nelchina caribou hunting permits issued annually and total harvest, regulatory years 2009 through 2017.

Year	RC566		CC001		DC480–483 or 485		Harvest Quota	Total State Permits	Reported Harvest <sup>a</sup>
	Permits	Harvest	Permits	Harvest	Permits	Harvest			
2009	500	277	477	127	-	-	1,000	979	797
2010 <sup>b</sup>	1,151	615	-	-	-	-	2,300	4,755	2,439
2011	3,148	1,626	322	87	1,127	319	2,400	4,598	2,515
2012	5,045	2,542	402	150	3,001	1,023	5,500	8,449	4,430
2013 <sup>c</sup>	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 <sup>d</sup>	8,470	3,482	1,006	370	5,000	1,898	-	14,476	6,241
2017 <sup>e</sup>	8,444	2,523 <sup>f</sup>	1,004	242 <sup>f</sup>	5,000	1,329 <sup>f</sup>	6,000	14,448	4,429 <sup>f</sup>

<sup>a</sup> Reported harvest includes caribou taken under state and federal hunts.

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

<sup>c</sup> State hunts were closed by Emergency Order on October 15<sup>th</sup>.

<sup>d</sup> State hunts (fall season) were extended by Emergency Order from September 20 to September 30; bag limit for RC566 and CC001 was raised from one to two caribou by Emergency Regulation in March 2017.

<sup>e</sup> State hunts (fall season) were extended by Emergency Order from September 20 to September 30.

<sup>f</sup> Harvest is ongoing.

Table 94-2. Nelchina caribou CSH participants in regulatory years 2009 through 2017.

Regulatory Year	Number of Groups	Number of Communities Represented	Number of Households	Number of Individuals	Number of Permits Reported Hunted
2009	1	27	477	-	288
2010 <sup>a</sup>	-	-	-	-	-
2011	6	29	322	636	176
2012	17	30	402	824	238
2013	28	40	689	1,424	308
2014	25	35	569	1,121	266
2015	26	39	659	1,359	330
2016	45	45	1,011	2,272	562
2017	51	47	1,085 <sup>b</sup>	2,507	274 <sup>c</sup>

<sup>a</sup>The community hunt was not offered in regulatory year 2010.

<sup>b</sup>Permits were not issued for every household because some were FTR.

<sup>c</sup>The hunt is ongoing.

**DEPARTMENT COMMENTS:** The department is neutral on the allocation of caribou and moose harvests in the Copper Basin Subsistence hunt area. At the special meeting in March 2017, the board passed Proposal 33, as amended, which retained the CSH for caribou and drawing hunts and modified the seasons for Tier I registration caribou hunts in Unit 13. The board’s action on Proposal 33 does not come into effect until the 2018/2019 regulatory year. Due to its action on Proposal 33, the board took no action on 23 other proposals to eliminate, restrict, reduce or otherwise modify the CSH hunts.

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

\*\*\*\*\*