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Our Culture Unites Us; Our Land Sustains Us; Our People are Prosperous

March 16, 2024

Alaska Board of Game

To the Members of the Alaska Board of Game:

Ahtna, Incorporated (“Ahtna”) is an Alaska Native Regional Corporation formed under the Alaska Native Claims Settlement Act. Ahtna’s more than 2,000 Ahtna Athabascan shareholders include many residents and tribal members from eight villages in the southcentral and interior region of Alaska, centered on the Copper River Basin. These Native Village residents continue to live a customary and traditional hunting and fishing way of life. Ahtna has managed its land and resources, including moose and caribou populations in its traditional territory, since time before memory.

Ahtna submits the following comments on Proposals 108, 111, 117,118, 189, 192, 193, and 194 currently under consideration before the Board.

Proposal 108

Reactivate wolf control in a portion of Units 12, 20D, and 20E to benefit moose.

COMMENTS:

We **support Proposal 108**. There should be consistency in regulating these areas in subsistence use, and this affects our Nelchina Caribou herd when they go through this portion of Unit 12.

Proposal 111

Add an archery only, five-day season for residents and nonresidents in Unit 12

COMMENTS:

We **oppose Proposal 111**. Archers do not need a special season, they can hunt during the general season. It would not be good to open the hunt to nonresidents either when we are experiencing a decline in the game population.

Proposal 117

Allocate Tok Management Area sheep drawing permits

COMMENTS:

We **oppose Proposal 117**. 2nd degree of kinship is still a non-resident, and should be taken from the non-resident allocation. A non-resident is a non-resident.

Proposal 118

Allocate a portion of the Tok Management Area sheep drawing permits to archery only, or create a new archery only hunting the area.

COMMENTS:

We **oppose Proposal 118**. We are against any special archery hunts. The archers can hunt during the regular hunting season. There is no need for a special hunt when our game population is already in a decline.

Proposal 189

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

COMMENTS:

We **support Proposal 189** Reauthorize the brown bear tag fee exemptions due to the strong decline in the caribou and moose populations and feel that this will affect the calving period by 2-3 years. They were only in place in western Alaska for brown bear hunts, and the expansion of the tag fee exemption to encourage more Alaskans to control predators, this tag fee exemption will also get rid of having to get the tag annually.

Proposal 192

Reauthorize the antlerless moose seasons in Unit 13A.

COMMENTS:

We **oppose Proposal 192**. The current management objective for the calf cow ratio is 25:100 and the calf cow ratio reported count is 11:100 which is far below this. There is no data for the bull cow ratio, and based on the calf cow ratio this will limit the calving period and lead to low recruitment of calves due to the taking of cows. In the department's report to the Copper Basin AC, there is talk about issuing 20 permits for the 24/25 season. With such a low calf recruitment this will be detrimental to the population's recovery.

There has been a low harvest recently and we are down to 528 total moose harvested in the 2023 season. There is an over harvest of the bulls because they are not providing enough for subsistence and the draw tags will only decrease the numbers by not having the potential for future bull calves.

Proposal 193

Reauthorize the antlerless moose seasons in Unit 13C.

COMMENTS:

We **oppose Proposal 193**. There were no population estimates for the bull cow and calf cow populations provided at the Copper Basin AC. The Department should err on the side of caution because of the lack of data. It has been noticed amongst the Ahtna people that they are not seeing cows with calves and very few bulls.

Proposal 194

Reauthorize the antlerless moose seasons in Unit 13E.

COMMENTS:

We **oppose Proposal 194**. There were no population estimates for the bull cow and calf cow populations provided at the Copper Basin AC. The Department should take precautionary measures because of this lack of data. We are not seeing the moose out on the land.

With an apparent decline in moose and the crash of the Nelchina Caribou Herd, the dependence and need to maintain a healthy moose population is crucial.

Culturally we never went for cow moose, and when we did, it was only for ceremonial reasons, and we made sure they were dry cows.

Sincerely,

Ken Johns, Chair

Ahtna Tene Nené Customary and Traditional Committee Ahtna, Incorporated