



# Ahtna Intertribal Resource Commission

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March 20, 2023

Alaska Board of Game  
 Southcentral Region Meeting March 17-22, 2023  
 Soldotna, Alaska

The Ahtna Intertribal Resource Commission (AITRC) Fish & Wildlife Committee met to discuss Proposal 207 to re-establish Nelchina caribou Tier II hunt management options for the ADF&G. Discussions focused on current Nelchina caribou population status, the continuing boom and bust management regime, and what it would take to get the population back into management objectives. Discussions were heavily influenced by the historical legacy of Tier II management in Unit 13, where young people were disenfranchised from participation and the prohibition of proxy hunting failed to recognize community patterns of use. The Committee concluded that Proposal 207 should be amended to include a moratorium on all hunting until the 2027-2028 regulatory cycle, or until population management objectives and demographic metrics (i.e. bull:cow ratios, calf:cow ratios) are achieved so as to rebuild the herd for all uses rather than go into Tier II.

The AITRC Fish and Wildlife Committee consists of six representatives from the AITRC member Tribes knowledgeable in traditional, state, and federal regulation. Their decision was difficult to make because of the sacrifice a caribou hunting moratorium would represent for subsistence-dependent families and communities. In addition to a caribou harvest decline below the lower limit of the ANS range, regionwide moose harvest is down. Federal subsistence caribou harvest is half of normal. A moratorium on caribou hunting will mean even more dependence on Copper River salmon, where the uppermost reach of the Glennallen Subdistrict ANS is rarely achieved.

However, the legacy of Tier II management and the necessity of retaining the community hunt structure compelled the AITRC Fish and Wildlife Committee to prioritize future subsistence hunting opportunities rather than continue harvesting Nelchina caribou under Tier II management when there is not a harvestable surplus or cows or bulls as outlined below:

Population		Bull: Cow Ratio		Calf: Cow Ratio	
Objective	Estimate	Objective	Estimate	Objective	Estimate
35,000 - 40,000	17,433 ± ??	40:100	26:100	40:100	16:100

The Ahtna Intertribal Resource Commission (AITRC) has closely monitored the Nelchina Caribou Herd over the years and has observed a consistent decline in population since 2019 (see Figure 1). The population objective for the herd is currently set at 35,000-40,000 animals, but the most recent population estimate in 2022 was only around 17,433 animals. It is highly

problematic that ADF&G fails to provide confidence intervals associated with such point estimates to allow the public to fully evaluate the uncertainty associated with these estimates. However, what AITRC's scientists can discern is that the current point estimate represents a 67% decline in a three-year period.

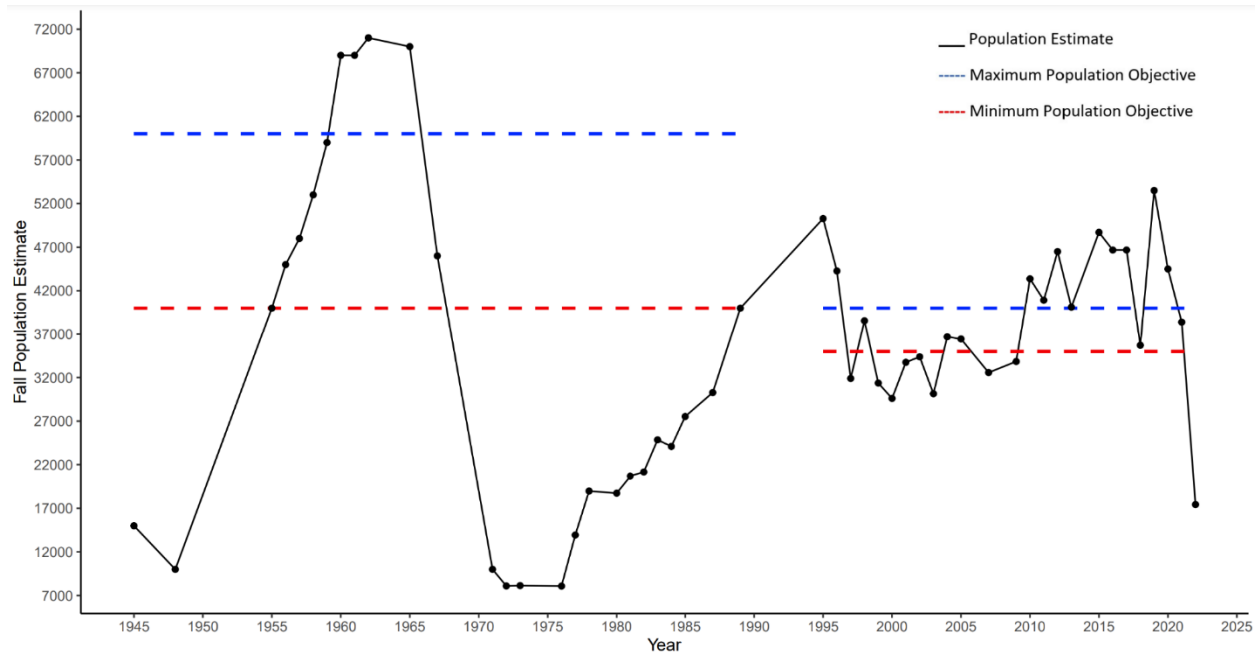


Figure 1

The Nelchina Caribou Herd is an important cultural and subsistence resource for the Ahtna people and other local communities, and we have a responsibility to ensure its long-term survival. We understand that hunting is an important part of Alaska's culture and economy, but we believe that a moratorium on the hunting of the Nelchina Caribou Herd is necessary to allow the population to recover to sustainable levels. This will also ensure that future generations of Alaskans will have access to this important resource.

We urge the Board to take immediate action to implement a moratorium on the hunting of the Nelchina Caribou Herd and to work with local communities, including AITRC, to develop a long-term management plan that ensures the sustainable use of this important resource. Should the caribou reach the mid-point of the population management objective of 35,000-40,000 before the 5 years Tier I and CSH can be implemented. The non-subsistence and draw hunts should only be restored when the population is above the management objective and demographic metrics.

AITRC was established by its eight federally recognized Tribes and two ANCSA corporation landowners who have sustainably stewarded the Nelchina caribou herd for over 10,000 years. AITRC and its member organizations are guided by the longstanding indigenous principle that if we (all of us) take care of the animals, they will in turn take care of us. It is time to take care of them by this moratorium. This action will allow the herd to recover more quickly.